

Ex. 18

[This exhibit is being filed under seal.]

EXHIBIT 19

WILLIAM G MONTGOMERY
MARICOPA COUNTY ATTORNEY

April Sponsel
Deputy County Attorney
Bar ID #: 023009
301 West Jefferson, 8th Floor
Phoenix, AZ 85003
Telephone: (602) 506-1131
mcaoctd@mcao.maricopa.gov
MCAO Firm #: 00032000
Attorney for Plaintiff

MICHAEL R. JEANES, CLERK
BY *J. Spelgatti* DEP.
FILED

17 SEP 15 AM 9:42

DR 201700028796 - Peoria Police Department
Arrowhead Justice Court

0131671718

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

COUNTY OF MARICOPA, EDC-DOWNTOWN

THE STATE OF ARIZONA,

Plaintiff,

vs.

MARK PASCALE,
aka Mark Anthony Pascale

Defendant.

CR 2017-141973-001

DIRECT COMPLAINT

**COUNT 1: POSSESSION OR USE OF
MARIJUANA, A CLASS 6 FELONY (Mark
Pascale)**

The complainant herein personally appears and, being duly sworn, complains on
information and belief against MARK PASCALE, charging that in Maricopa County, Arizona:

COUNT 1:

MARK PASCALE, on or about May 1, 2017, knowingly did possess or use an amount of
marijuana having a weight of less than two pounds, in violation of A.R.S. §§ 13-3401, 13-3405,
13-3418, 13-701, 13-702, and 13-801.

DCO

MC-00057

CJ

/s/ April Sponsel
Deputy County Attorney

It is requested that a **SUMMONS** be issued. IT IS requested that the Defendant appear for fingerprints and photograph.

ABene #13910
Complainant

Agency: Peoria Police Department

Subscribed and sworn upon information and belief this 14 day of September, 2017.

AS/mm

<u>Superior</u> COURT	<u>Maricopa</u> County, <u>Arizona</u>	
State of Arizona Plaintiff -vs- <u>Mark Pascale</u> Defendant (FIRST, MI, LAST)	[CASE/COMPLAINT NO.] <u>2017-00028796</u> Booking No. _____	RELEASE QUESTIONNAIRE (To be completed by Law Enforcement)

Alias(es) **A. GENERAL INFORMATION**

Charges: 13-3405A1, 13-3515A, 13-3102A8

Offense Date: 05-01-2017 Offense Time: 1543

Location: 7500 W. Cactus Road Peoria, Arizona

Arrest Date: 05-01-2017 Arrest Time: 1607

Arrest Location: 7500 W. Cactus Road Peoria, Arizona

Pursuant to A.R.S. 41-1750, were ten-print fingerprints taken of the arrested Person? ☐ Yes ☒ NoPursuant to A.R.S. 13-610, does one or more of the above charges require the arresting agency to secure a DNA sample from the arrested person? ☐ Yes ☒ NoIf yes, does the defendant have a valid DNA sample on file with AZDPS? ☐ Yes ☒ NoIf no, has the arresting agency taken the required sample? ☐ Yes ☒ No**B. PROBABLE CAUSE STATEMENT**

1. Summarize and include the facts which establish probable cause for the crime(s) charged. Certain felonies may be non-bondable and require facts which establish proof evident or presumption great for the crime(s) charged. These include (1) felonies involving a capital offense, sexual assault, sexual conduct with a minor who was under fifteen years of age, and (2) felony offenses committed when the person charged is already admitted to bail on a separate felony charge.

Explain the crime(s) in detail (e.g., arresting officer or other law enforcement officers witnessed offense, physical evidence directly connects defendant to offense, multiple eyewitnesses, defendant admissions, victim statements, nature of injuries, incriminating photographic, audio, visual, or computer evidence, defendant attempted to flee or resist arrest).

2. The person entered or remained in the United States illegally. Explain in detail (e.g., admission of by the person, statements of co-defendants at the time of arrest, verification of illegal presence or proceeding establishes illegal presence):

3. The crime(s) occurred while the person was admitted to bail on any separate felony. Provide information on the separate felony:

Defendant's Name Mark Pascale DOB [REDACTED] Booking No. [REDACTED] Case No. 2017-00028796

C. OTHER INFORMATION (Check if applicable)

1. ☐ Defendant is presently on probation or any other form of release involving other charges or convictions. Explain:

2. List any prior Arrests:

Convictions:

Failures to Appear (FTA):

Protective Orders:

3. There is an indication of:

- ☐ Alcohol Abuse ☐ Other Substance Abuse ☐ Physical Abuse
☐ Mental Health Issues ☐ Developmental Disability

Explain:

4. Defendant is employed by:

Address:

Cell/Phone:

How Long:

5. Defendants resides at:

With Who:

How Long:

Alternate Address for court notification:

6. Facts to indicate defendant will flee if released:

6. Cont.

7. Reasons to oppose an unsecured release:

8. ☐ Defendant speaks a language other than English

Language Spoken:

- ☐ American Sign Language
☐ Defendant requested an interpreter

D. CIRCUMSTANCES OF THE OFFENSE

1. ☐ Defendant used firearm or other weapon
Type:

2. ☐ Defendant injured someone. Explain:

3. ☐ Medical attention was necessary
Nature of Injuries:

4. ☐ Defendant threatened someone. Nature of threats:

5. Did the offense involve a child victim? ☐ Yes ☒ No

If yes, was the DCS notified? ☐ Yes ☐ No

6. If property Offense

a. Value of property taken/damaged:

b. ☐ Property was recovered

7. Names of co-defendant(s), if any:

E. CRIME(S) AGAINST PERSONS

1. Relationship of defendant to victim: _____

2. ☐ Victim(s) and defendant reside together

3. Law enforcement learned of the situation by

☐ Victim ☐ Third Party ☒ Officer Observation

4. ☐ Previous incidents involving these same parties Explain:

5. Defendant is currently the subject of:

☐ Order of Protection ☐ Injunction against Harassment
☐ Other court order _____

6. ☐ Likelihood of inappropriate contact with victim(s) Explain:

Defendant's Name Mark Pascale DOB [REDACTED] Booking No. [REDACTED] Case No. 2017-00028796

7. ☐ Victim(s) expressed an opinion on defendant's release
Explain:

4. State whether defendant was under the influence of alcohol or drugs at the time of the offense

☐ Yes ☒ No ☐ Unknown
Type of substance:

F. DOMESTIC VIOLENCE DEFENDANT ISSUES

- ☐ Access to, or use of weapons
☐ Children/Vulnerable adults present
☐ Crime occurred in public
☐ Control/ownership/jealousy issues
☐ Depression
☐ Frequency/intensity of Domestic Violence increasing
☐ Kidnapping
☐ Potential for multiple violations of court orders
☐ Prior history of Domestic Violence
☐ Prior Protective Order
☐ Recent separations
☐ Stalking behavior
☐ Threats of homicide/suicide/bodily harm
☐ Violence against children, vulnerable adults or animals
 Explain:

H. DRUG OFFENSES

1. If the defendant is considered to be a drug dealer, state the supporting facts:
No

2. State quantities and types of illegal drugs directly involved with offense:
Marijuana

☐ Methamphetamine was involved:

☐ Drug field test was positive

☒ Defendant admitted drug type: marijuana

☐ Approximate monetary value of drugs [REDACTED]

3. State whether money was seized ☐ Yes ☐ No Amount: [REDACTED]

G. CIRCUMSTANCES OF ARREST

1. Did defendant attempt to:

☐ Avoid arrest ☐ Resist arrest ☐ Self Surrender Explain:

If this is a fugitive arrest, complete the affidavit as required by the Uniform Criminal Extradition Act (ARS 13-3841 et seq.)

2. ☒ Defendant was armed when arrested? Type of weapon:
Handgun on the floor board of the car.

3. ☒ Evidence of the offense was found in defendant's possession. Explain:
Found in the center console of the vehicle he was driving.

I certify that the information presented is true to the best of my knowledge

05-01-2017
Date

M. Fuller
Arresting Officer

Peoria
Agency

11205
Serial No.

2017-00028796
Departmental Report #

Duty Phone No. [REDACTED]

Pursuant to A.O. 2003-046, the oath has been administered pursuant to the law and required procedures. [Signature]

Defendant's Name Mark Pascale DOB [REDACTED] Booking No. Case No. 2017-00028796

Additional Narrative

On May 1st, 2017 at about 1547 hours, I was dispatched to a non-injury hit and run accident in the area of 7500 W. Cactus Road Peoria, Arizona 85381. The caller stated they were involved in a road rage incident and the other vehicle hit them and then ran a red light. Upon my arrival, I made contact with the caller, (S) Mark Pascale, who was standing next to his gold sedan bearing an Arizona license plate of BDK3825.

While walking up to the vehicle, I was able to observe in plain view a glass bong sticking out of the center console. The bong was clear, and marijuana leaves emblems on the sides of it. I asked Mark about the bong, and he stated it was his girlfriend's and she had left it inside of the car.

I removed the bong from the center console and discovered an overwhelming odor of unburnt marijuana emitting from inside of the car. Also in the center console was a black pouch with a glass smoking pipe sticking out of it and several plastic cylinder containers. I removed the pouch and found a green leafy substance inside of them based on my training and experience as a Police Officer believed to be marijuana.

On the driver's floor board of the vehicle, I also located a small black in color handgun. I removed the .380 handgun and unloaded it at the rear of the sedan which it had a round chambered.

Officer M. Kane had been speaking with Mark about the hit and run accident. Once he was done, I advised Mark of his Miranda rights at about 1607 hours which Mark stated "yes to understanding his rights. Mark stated he had just dropped his girlfriend, Krystle Aguilar, off at work and it was her bong, pipe, and marijuana. Krystle also has a medical marijuana card according to Mark, and usually, he doesn't drive around with it in the vehicle. Mark, however, did admit to knowingly being in possession of it while also in possession of a handgun. The green leafy substance was later impounded at the Peoria Police Department as evidence and submitted to DPS for testing of its content and weight. The handgun was left in Mark's possession.

Due to Mark being found in possession of drug paraphernalia, marijuana, and a handgun the following charges are being submitted to the Maricopa County Prosecutors Office for charging: ARS 13-3405A1, ARS 13-3415A, and ARS 13-3102A8.

EXHIBIT 20

MARICOPA COUNTY ATTORNEY/TASC DIVERSION SUBMITTAL FORM

TASC ID: Redacted 9808
DR #: Redacted 28796
SUBMITTAL #: CR2017-141973-001
AGENCY: PEORIA PD
ATTORNEY: MARC BIVENS

CASE MANAGER: VIVIANA GARCIA
OFFENSE: POM
ACCEPTANCE DEADLINE:
6 MOS TASC DEADLINE: 05/21/2018
☒ **EDC** ☐ **PRE IA** ☐ **SEF** ☐ **PREFILE**
☐ **RE-ENTRY** ☐ **2ND OFFER** ☐ **RCC**

TASC CLIENT: PASCALE, MARK ANTHONY

AKA:

HOME ADDRESS: 13051 N. 75TH DR
 PEORIA AZ 85381

BUSINESS PHONE:
MESSAGE PHONE: 602-518-8271
CELLULAR PHONE:

HOME PHONE: 602-619-5970

DEFENDANT'S DESCRIPTION:

RACE: **SEX:** M **HAIR:** **EYES:** **HEIGHT:**
WEIGHT: **DOB:** Redacted 1958 **SOCIAL SECURITY #:** 000-00-3283

TASC LETTER DATE: ☒ **PRESCREENING START DATE:** 11/21/17
☒ **PRESCREENING COMPLETION DATE:** 12/27/17 ☐ **NO RESPONSE:**
☒ **TASC ACCEPTANCE:** 11/21/17 ☐ **REFUSED TASC:**
☐ **RESPONDED, FAIL TO APPEAR:** ☐ **INCORRECT ADDRESS**
☐ **FAILED PRESCREEN** ☐ **OTHER:**
☐ **TASC DENIAL:**

☒ **TASC COMPLETED IN FULL:** 7/5/18

☒ **TASC FEE PAID IN FULL:** \$150.00 **MCSO FUND:** \$0.00
☒ **DRUG FUND ASSESSMENT PAID IN FULL:** \$650.00 on 6/29/18
☒ **SEMINAR COMPLETED**
☒ **DRUG TESTING NEGATIVE**

UNSUCCESSFUL TASC TERMINATION:

☐ **TASC FEE NOT PAID OR ONLY PAID** **BALANCE:** **MSCO FUND BALANCE:**
☐ **DRUG FUND ASSESSMENT NOT PAID, OR ONLY PAID** **DRUG FUND BALANCE:**
☐ **SEMINAR NOT ATTENDED/UNEXCUSED ABSENCES**
☐ **DRUG TESTING POSITIVE ON DATES AND FOR THE DRUGS LISTED UNDER COMMENTS**
☐ **NEW ARREST CHARGE**
☐ **MOVED NO FORWARD ADDRESS**
☐ **FAILURE TO PROVIDE URINE TEST**
☐ **FAILURE TO RESPOND TO CONTACT LETTER**
☐ **OTHER:**

LAST KNOWN ADDRESS: SAME AS ABOVE

PROTECTED HEALTH INFORMATION

TASC000221

TASC ID: Redacted 3808

TASC CLIENT: PASCALE, MARK ANTHONY

DR #: Redacted 3796

SUBMITTAL #: CR2017-141973-001

COMMENTS:

CLIENT HAS SUCCESSFULLY COMPLETED THE TASC POM DIVERSION PROGRAM.



This certifies that

Mark Pascale

has successfully completed

*The Maricopa County Attorney/TASC Adult
Deferred Prosecution Program*

Presented on July 5, 2018

Douglas R. Kramer
CEO

Case Manager

Traci Davis



July 5, 2018

RE: CR # 2017-141973-001

Dear Mark Pascale,

You have successfully completed the Maricopa County Attorney/TASC Adult Deferred Prosecution Program. The necessary paperwork has been submitted to the Maricopa County Attorney's Office (MCAO) for processing.

Please allow six to eight weeks for paperwork to be processed. At that time you can go to the Customer Service Center to pick up your dismissal. The Customer Service Center is located at 601 W. Jackson Phoenix, AZ with hours of operation Monday- Friday 8am-5pm. Your case number has been referenced above for your convenience in order to obtain a copy of your court dismissal.

Congratulations and good luck to you in your future endeavors. Feel free to contact us if we may be of further assistance to you.

Sincerely,

Viviana Garcia
POM Case Manager
602-254-7328 Ext. 220-Phone
602-903-1290 -Fax

7/5/18 2:02:21PM

Case Notes

For

PASCALE, MARK

Created on: 7/5/2018

Created by: vgarcia

CM called CT and informed CT GCMS were positive for RX but CM does not have an updated prescription for Morphine, in order for CM to complete CT from the program CM needs proof of morphine prescription CM has a prescription but dated 4/26/18. CT stated can get it for CM. CM informed CT to provide it before 5pm that way CM is able to complete CT from program today. CT stated if he can fax it to CM. CM stated yes and provided Ct CM fax number. CM informed CT once CM has prescription CM can send completion papers to HQ. CT stated will go to pharmacy right now. CM reviewed program requirements.

Created on: 7/5/2018

Created by: vgarcia

CT turned in prescription for Morphine Sulfate dated 6/25/18 (30qty)

Created on: 7/5/2018

Created by: vgarcia

CM called CT informed CM has received prescription CM will be completing CT from program today CT can go into HQ to pick up completion papers. CM explained that after 6-8 weeks CT can go to pick up a court dismissal to location listed on letter. CT stated though he was never going to be done. CM stated the good thing CT completed program and does not have to worry about felony on record. CT acknowledged and thanked CM. CM reviewed program requirements.

Created on: 7/5/2018

Created by: vgarcia

CLIENT SUCCESSFULLY COMPLETED THE TASC DIVERSION PROGRAM. FILE WAS RETURNED TO COUNTY ATTORNEY TO BE DISMISSED.

PROTECTED HEALTH INFORMATION

TASC000225

7/5/18 2:02:21PM

Case Notes
For
PASCALE, MARK

Created on: 5/10/2018 Created by: vgarcia

CT turned in prescription for Oxycodone filled 4/26/18 120 qty and Morphine Sulfate.

Created on: 5/11/2018 Created by: vgarcia

CT tested pos for OPI CT has prescription.

Created on: 5/31/2018 Created by: vgarcia

CT tested pos for OPI CT has prescription.
 CM sent GCMS request to lab.

Created on: 6/5/2018 Created by: vgarcia

CT GCMS was pos for RX.

Created on: 6/21/2018 Created by: vgarcia

CT called CM and stated today is CT birthday and has to test is CT can be excused from test. CM stated no must test when required, CM stated CT been compliant asked when is CT able to pay fee's to be S.Term. CT stated is hoping by next week. CM stated once fee's are paid to contact CM. CT stated he will. CM reviewed program requirements.

Created on: 7/2/2018 Created by: vgarcia

CT called CM and stated has paid off fee's in full. CM reviewed CT requirements and informed CT of OPI positive on 6/29/18 and informed CT would have to pay for GCMS test to confirm positive. CT upset stated why id CT has paid fee's CT should be done. CM stated cannot complete CT from program due to positive, CT needs to confirm OPI per CA. CT upset (raising voice) stated that is is not right what TASC is doing CT has been in program longer than should have and CM is aware of CT prescription. CM stated is aware of medication but has been told numerous time CT is to pay for GCMS to confirm positive. CT (raising voice) stated this is ridiculous and TASC is just taking money away that CM stated if CT continued to raise voice CM would have to disconnect call. CT calmed down. CM explained to CT again that CT would have to pay GCMS to confirm positive, it would be best if CT can do it by today so CM can send request to lab and hopefully CT can be done from program by Friday. CT stated he will pay for it. CM reviewed program requirements.

Created on: 7/2/2018 Created by: vgarcia

CM sent GCMS request for OPI positive

Created on: 7/5/2018 Created by: vgarcia

CM received CT GCMS result pos for RX.

7/5/18 2:02:21PM

Case Notes**For****PASCALE, MARK**

Created on: 3/21/2018

Created by: vgarcia

Called CM upset re: mandatory payment. CT stated was just told CT can pay \$50 and CT did CT will try to gets funds for this month. CM informed CT put on mandatory payment as CT is behind CM is aware CM informed CT on only paying \$50 but payments are of \$160 leaving CT still behind. CT stated if he can just pay for UA. CM informed CT will have to pay additional \$10 that does towards balance and per contract if CT does not make payment will be on mandatory payment, CT should have initially be done but has a big balance. CT stated he understood but is struggling did not have food last week had to go to food bank. CM suggested CT apply for food stamps if CT is struggling.

Created on: 3/27/2018

Created by: vgarcia

CT called CM and stated go an increase in credit card to pay balance. CM informed CT TASC only accepts money order or debit card if CT is able to pay balance and not test on 3/29/18 CT can be done. CT stated will talk to bank to see if CT can take money out to pay off balance. CM stated if CT pays off to contact CM. CT acknowledged.

Created on: 3/28/2018

Created by: vgarcia

CT called CM and stated was only able to get a cash advance of \$300, but is going to find out if it is only once a month. CM stated to pay that and hopefully CT can get balance paid off soon. CT stated that is what is hoping for going to find out and will pay the \$300 next time. CM acknowledged.

Created on: 3/30/2018

Created by: vgarcia

CT met with CM and stated made a payment if CT can be removed mandatory payment. CM removed CT off mandatory and informed CT once CT is able to pay balance off to inform CM to see when CT can be completed. CT acknowledged.

Created on: 4/13/2018

Created by: vgarcia

CT met with CM. CT stated this is third time in a week CT has not tested although CT did not test for two weeks. CM stated due to CT not testing for some weeks that might be as to why CT has had to test so frequently. CT stated it is nice not to test so much but that is to much in a week. CM suggested CT save the money for the week CT did not test as CT will have to test.

Created on: 4/16/2018

Created by: vgarcia

CT met with CM and provided prescription oxycodone and Morphine Sulfate filled 3/26/18. CT stated will pay for GCMS test. CT stated had to test three times in a week. CM stated it might have been due to CT not testing for two week. CT acknowledged. CM asked CT how is CT doing with balance CT stated is working on it aware that is only thing that is keeping CT on program. CM acknowledged.

CT tested pos for OPI. CT now has a prescription on file.

Created on: 5/2/2018

Created by: vgarcia

CM attempted to contact CT re: OPI pos. CM LVM stating if CT has filled prescription for Oxycodone as CM needs proof, CM asked for call back.

Created on: 5/2/2018

Created by: vgarcia

CT returned CM call. CM asked CT if has filled prescription for Oxycodone. CT stated just did on the 26th. CM stated of April. CT acknowledged. CM informed CT must provide CM proof of prescription each time CT fills medication, CT tested pos on 5/1/18 CT will be required to pay for GCMS not later than 5/18/18. CT stated if CT has to each time. CM acknowledged as it also states in contract. CT stated why are test now showing pos. CM stated is just going off UA results and provides information to CT. CT stated needs to pay balance soon, CT will get prescription. CM reviewed program requirements.

PROTECTED HEALTH INFORMATION

TASC000227

7/5/18 2:02:21PM

Case Notes
For
PASCALE, MARK

Created on: 1/30/2018

Created by: vgarcia

Ct met with CM and provided CM financial hardship proof CM informed CT Cm will forward information to lead with decision CT stated if he has to continue testing CM informed CT is until CT is done with program CT stated he understood CM reviewed program requirements

Created on: 2/1/2018

Created by: vgarcia

CM called CT to remind of seminar on 2/1/18 CM informed CT has not made a payment was told had to make one by end of month. CT stated he will make payment tomorrow. CM informed CT failure to do so will result in \$10 mandatory payment each time CT test. CT acknowledged and stated he will make a payment. CM informed CT payment are of \$160 but CT can make a \$50 payment although CT is behind. CT acknowledged CM reviewed program requirements

Created on: 2/2/2018

Created by: vgarcia

CT attended 2/1/18 seminar

Created on: 2/8/2018

Created by: vgarcia

CT tested pos for OPI CT has a prescription
From: Viviana GarciaSent: Thursday, February 08, 2018 3:53 PMTo: 'mark2496@cox.net' <mark2496@cox.net>Subject: TASC
Hi Mark,You tested positive for opiates you will need to pay for a GCMS to confirm it is your medication as you do have a prescription on file.
Thank you,
VIVIANA GARCIACase Manager

Created on: 2/9/2018

Created by: sthrash

Client tested positive for OPI on 2/8/18. Client has prescription on file.

Created on: 2/12/2018

Created by: vgarcia

CT called CM and stated CT just saw email that CT has to pay for GCMS but CM has prescription to proof CT is on medication. CM informed CT has to pay for GCMS to confirm that it is medication if CT does not want to pay for GCMS CT will not be able to take medication while on program. CT stated if he will have to pay each time as CT is struggling. CM informed CT has only tested pos for medication in January and in February 7 and 8 CT has to pay for GCMS by 2/13/18 that would cover for both dates. cT acknowledged CM reviewed program requirements

Created on: 3/21/2018

Created by: vgarcia

mandatory payments
From: Viviana GarciaSent: Wednesday, March 21, 2018 8:22 AMTo: 'mark2496@cox.net' <mark2496@cox.net>Subject: TASC
Hello Mark,Please be advised that our records indicate that you are behind on your monthly payments. Per your signed client contract, you are responsible to make your designated payment of \$160.00 every 3rd Friday of the calendar month until your balance is paid in full. If you are unable to make your full monthly payment, you MUST make a minimum payment of \$50.00 each month in order to stay in program compliance. Due to you being behind you will be on mandatory payment and be required to pay \$25 each time you test (\$15 for your UA \$10 towards your balance). If you have any questions feel free to contact me. Thank you,
VIVIANA GARCIACase Manager

7/5/18 2:02:21PM

Case Notes**For****PASCALE, MARK**

Created on: 12/1/2017

Created by: vgarcia

Name: Mark Pascale DOB: 6/21/1958 Donor ID: 236209808 Intake: 11/21/17 Pin: 3615 Charge/UA Fee: 14 Payment: \$160 First payment: 12/15/17 Seminar: 1/11/18 Email: mark2496 @ cox.net

Created on: 12/6/2017

Created by: vgarcia

CM received CT SSI letter and list of medication from June to October Oxycodone morphine sulfate and clonazepam

Created on: 12/27/2017

Created by: vgarcia

CLIENT HAS BEEN ACCEPTED INTO THE TASC POM DIVERSION PROGRAM

Created on: 1/19/2018

Created by: vgarcia

CM attempted to contact CT LVM for call back
CT tested pos for opiates CM does not have new prescription on file

Created on: 1/22/2018

Created by: vgarcia

CM called CT and asked if CT is taking any medication CT stated CT is taking the same medication. CM informed CT tested pos for opi. CM needs CT to turn in prescription as well pay for GCMS. CT stated he cannot afford to pay. CM informed CT if CT continues to test pos. will only have to pay for GCMS one time, CT failed to attend seminar and make payment. CT stated he was not informed and can get letter from doctor that CT is on medication. CM informed CT per agreement if CT desires to take medication has to pay for GCMS. CT stated CT has been on medication and should have been pos. CM informed CT has not. CM asked CT if CT has CM business card CT stated he does. CM informed CT on back of business card has information about seminar. CT stated he must have forgotten. CM r/s 2/1/18 informed CT has to make a payment by end of month or will result in mandatory payment CT has to pay for GCMS before 1/23/18. CT stated he understood CM reviewed program requirements

Created on: 1/24/2018

Created by: vgarcia

CT turned in prescription for oxycodone Hcl, Morphine Sulfate, Cyclobenaprine Hcl, Tramadol Hcl, Pantoprazole, Januvia, Atorvastatin Ct informed CM CT paid for GCMS test CM informed CT CM will submit it to the lab should get results in about 3-5 days CT stated he understood CM reviewed program requirements

Created on: 1/26/2018

Created by: vgarcia

GCMS results came back pos for RX.

Created on: 1/29/2018

Created by: vgarcia

CT met with CM and provided information for Financial Hardship. CM informed CT needs to show proof of everything written on financial form as CM as to turn into lead. CT stated he will get proof. CM informed CT failed to test. CT stated he did forget to check. CM informed CT will result in VL due to not testing and GCMS results came back pos. for prescription. CM informed CT due to missed test it can push CT financial hardship back. CT stated hopefully it does not CM informed CT it would depend on lead. CT stated he understood CM reviewed program requirements



TASC DRUG DETECTION LABORATORY
4016 N. Black Canyon Hwy -- Phoenix, AZ 85017
CLIA# 03D0938729 / CAP-LAP# 3201701
DIRECTOR: Dr. Gerald Clement, Ph.D.

7/5/18 1:58PM

Individual Testing Compliance Summary for the Period: 7/1/11 - 7/31/18

Name		DOB	Account		Agency ID		Current Color				Referred By:						
PASCALE, MARK		Redacted /58	POM/B								GARCIA, VIVIANA						
Date	Random Color Match	Accn #	ALC	AMP	BAR	BEN	COC	MDN	OPI	PCP	PRO	THC	BUP	XTC	ETG	OTH	Com
05/30/18	IVR - Match	12107447		neg			neg		POS			neg			neg		1
06/05/18	IVR - Match	12119618		neg			neg		neg			neg			neg		
06/08/18	IVR - Match	12128208		neg			neg		neg			neg			neg		
06/13/18	IVR - Match	12136839		neg			neg		neg			neg			neg		
06/21/18	IVR - Match	12154827		neg			neg		neg			neg			neg		
06/29/18	IVR - Match	12173120		neg			neg		POS*			neg			neg		

* Confirmed by alternate method. Refer to individual report for details of analysis.

Comments:

1 TASC recommends confirming all positive drug screens by GC/MS or LC/MS/MS analysis.

TEST LEGEND:	ALC	- Alcohol	BUP	Buprenorphine	OPI	- Opiates	XTC	- Ecstasy
	AMP	- Amphetamines	COC	- Cocaine	PCP	- Phencyclidine	OTH	- Other
	BAR	- Barbiturates	ETG	Ethyl Glucuronide	PRO	- Propoxyphene	Com	- Comments
	BEN	- Benzodiazepines	MDN	- Methadone	THC	- Marijuana		

Donor Redacted 808

TASC Recommends that all Positive samples be confirmed by GCMS analysis.
 If a donor appears as a "No Specimen Collected" on this report,
 contact a TASC representative to verify compliance before taking any action against the donor.

Page 2 of 2
 PROTECTED HEALTH INFORMATION

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 TASC000230



TASC DRUG DETECTION LABORATORY
 4016 N. Black Canyon Hwy -- Phoenix, AZ 85017
 CLIA# 03D0938729 / CAP-LAP# 3201701
 DIRECTOR: Dr. Gerald Clement, Ph.D.

7/5/18 1:58PM

Individual Testing Compliance Summary for the Period: 7/1/11 - 7/31/18

Name	DOB	Account	Agency ID	Current Color	Referred By:												
PASCALE, MARK	Redacted/58	POM/B			GARCIA, VIVIANA												
Date	Random Color Match	Acctn #	ALC	AMP	BAR	BEN	COC	MDN	OPI	PCP	PRO	THC	BUP	XTC	ETG	OTH	Com
11/21/17	No Sample Collected (IVR)																
11/22/17	IVR - Match	11693889		neg			neg		neg			neg			neg		
11/30/17	IVR - Match	11708211		neg			neg		neg			neg			neg		
12/01/17	IVR - Match	11712745		neg			neg		neg			neg					
12/08/17	IVR - Match	11728609		neg			neg		neg			neg					
12/16/17	IVR - Match	11746912		neg			neg		neg			neg			neg		
12/20/17	IVR - Match	11754813		neg			neg		neg			neg					
12/27/17	IVR - Match	11769307		neg			neg		neg			neg			neg		
01/11/18	IVR - Match	11801559		neg			neg		POS*			neg			neg		
01/22/18	IVR - Match	11822582		neg			neg		neg			neg			neg		
01/25/18	No Sample Collected (IVR)																
01/26/18	No Sample Collected (IVR)																
01/29/18	IVR - Match	11837020		neg			neg		neg			neg			neg		
02/02/18	IVR - Match	11849620		neg			neg		neg			neg			neg		
02/07/18	IVR - Match	11861343		neg			neg		POS			neg			neg		1
02/08/18	IVR - Match	11862803		neg			neg		POS*			neg			neg		
02/13/18	IVR - Match	11874323		neg			neg		neg			neg			neg		
02/27/18	IVR - Match	11905033		neg			neg		neg			neg			neg		
03/09/18	IVR - Match	11930187		neg			neg		neg			neg			neg		
03/14/18	IVR - Match	11939479		neg			neg		neg			neg			neg		
03/15/18	IVR - Match	11942587		neg			neg		neg			neg			neg		
03/16/18	IVR - Match	11945832		neg			neg		neg			neg			neg		
03/20/18	IVR - Match	11953518		neg			neg		neg			neg			neg		
04/11/18	IVR - Match	12001675		neg			neg		POS			neg			neg		1
04/12/18	IVR - Match	12003807		neg			neg		POS*			neg			neg		
04/13/18	IVR - Match	12006673		neg			neg		POS			neg			neg		1
04/19/18	IVR - Match	12019988		neg			neg		POS			neg			neg		1
04/30/18	IVR - Match	12043111		neg			neg		POS			neg			neg		1
05/01/18	IVR - Match	12046004		neg			neg		POS			neg			neg		1
05/10/18	IVR - Match	12066367		neg			neg		POS			neg			neg		1
05/15/18	IVR - Match	12076608		neg			neg		neg			neg			neg		
05/24/18	IVR - Match	12099389		neg			neg		POS*			neg			neg		

TEST LEGEND:	ALC - Alcohol	BUP Buprenorphine	OPI - Opiates	XTC - Ecstasy
	AMP - Amphetamines	COC - Cocaine	PCP - Phencyclidine	OTH - Other
	BAR - Barbiturates	ETG Ethyl Glucuronide	PRO - Propoxyphene	Com - Comments
	BEN - Benzodiazepines	MDN - Methadone	THC - Marijuana	

Redacted
 Donor | 308

TASC Recommends that all Positive samples be confirmed by GCMS analysis.
 If a donor appears as a "No Specimen Collected" on this report,
 contact a TASC representative to verify compliance before taking any action against the donor.

PROTECTED HEALTH INFORMATION

TASC000234, TASC, Inc.


TASC
TASC DRUG DETECTION LABORATORY

 4016 N. Black Canyon Hwy -- Phoenix, AZ 85017
 CLIA# 03D0938729 / CAP-LAP# 3201701
 DIRECTOR: Dr. Gerald Clement, Ph.D.


DONOR NAME:	PASCALE, MARK	CLIENT ID:	POM/B
ACCESSION NUMBER:	12173120	DONOR ID:	Redacted 19808
COLLECTION DATE:	06/29/18 16:33	D.O.B.:	Redacted /58 12:00:01
RECEIVED DATE:	06/30/18 0:29	TEST COLOR:	IVR
REPORT DATE:	07/05/18 9:00		
REFERRED BY:	GARCIA, VIVIANA		

SCREENING TESTS

<u>TEST NAME</u>	<u>TEST RESULT / CONCENTRATION</u>	<u>NORMALIZED</u>	<u>CUTOFF LEVEL</u>	<u>METHOD</u>	<u>MEDIA</u>
AMPHETAMINE	Negative		1000 NG/ML	EIA	URINE
COCAINE	Negative		300 NG/ML	EIA	URINE
ETHYL GLUCURONIDE	Negative		500 NG/ML	EIA	URINE
OPIATES	POSITIVE		2000 NG/ML	EIA	URINE
THC	Negative		50 NG/ML	EIA	URINE

CONFIRMATORY TESTS

<u>ANALYTE</u>	<u>TEST RESULT / CONCENTRATION</u>	<u>NORMALIZED</u>	<u>CUTOFF LEVEL</u>	<u>METHOD</u>	<u>MEDIA</u>
GCMS CODEINE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS MORPHINE	POSITIVE 1178 NG/ML		300 NG/ML	GCMS	URINE
GCMS OXYCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS OXYMORPHONE	POSITIVE 431 NG/ML		300 NG/ML	GCMS	URINE

URINE VALIDITY TESTS

<u>TEST NAME</u>	<u>TEST RESULT / INTERPRETATION</u>	<u>ACCEPTABLE RANGE</u>
SPECIFIC GRAVITY	1.0080	1.003 or greater
CREATININE	71.0	20 mg/dL or greater

PROTECTED HEALTH INFORMATION TASC000232



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK	Account Code:	POM/B		
Accession #:	12173120	Donor Id :	Redacted 9808	DOB:	Redacted 1958
Collection Date:	6/29/2018 4:33:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	7/2/2018 5:40:39 PM
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(Signature)



IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE AGENCY, PRINT THIS FORM AND FAX TO 480-865-2079.
IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE CLIENT, PLEASE PRINT THIS FORM AND PROVIDE TO THE CLIENT TO SUBMIT WITH PAYMENT AT THE TASC FACILITY.

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**TASC DRUG DETECTION LABORATORY**

4016 N. Black Canyon Hwy -- Phoenix, AZ 85017

CLIA# 03D0938729 / CAP-LAP# 3201701

DIRECTOR: Dr. Gerald Clement, Ph.D.



DONOR NAME: PASCALE, MARK
 ACCESSION NUMBER: 12099389
 COLLECTION DATE: 05/24/18 19:52
 RECEIVED DATE: 05/24/18 22:29
 REPORT DATE: 06/01/18 10:09
 REFERRED BY: GARCIA, VIVIANA

CLIENT ID: POM/B
 DONOR ID: Redacted 9808
 D.O.B.: 6/21/58 12:00:01
 TEST COLOR: IVR

SCREENING TESTS

TEST NAME	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
AMPHETAMINE	Negative		1000 NG/ML	EIA	URINE
COCAINE	Negative		300 NG/ML	EIA	URINE
ETHYL GLUCURONIDE	Negative		500 NG/ML	EIA	URINE
OPIATES	POSITIVE		2000 NG/ML	EIA	URINE
THC	Negative		50 NG/ML	EIA	URINE

CONFIRMATORY TESTS

ANALYTE	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
GCMS CODEINE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS MORPHINE	POSITIVE 1210 NG/ML		300 NG/ML	GCMS	URINE
GCMS OXYCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS OXYMORPHONE	Negative		300 NG/ML	GCMS	URINE

URINE VALIDITY TESTS

TEST NAME	TEST RESULT / INTERPRETATION	ACCEPTABLE RANGE
SPECIFIC GRAVITY	1.0135	1.003 or greater
CREATININE	98.0	20 mg/dL or greater

05/30/2018 WED 15:07

FAX

001

 *** FAX TX REPORT ***

TRANSMISSION OK

JOB NO. 2790
 DESTINATION ADDRESS 4808652079
 SUBADDRESS
 DESTINATION ID
 ST. TIME 05/30 15:06
 TX/RX TIME 00' 29
 PGS. 1
 RESULT OK



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK		Account Code:	POM/B	
Accession #:	12099389	Donor Id:	Redacted 9808	DOB:	Redacted 58
Collection Date:	5/24/2018 7:52:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	5/30/2018 3:00:49 PM
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(Signature)



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 FAX TO 480-865-2079
 IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE CLIENT, PLEASE PRINT THIS FORM
 AND PROVIDE TO THE CLIENT TO SUBMIT WITH PAYMENT AT THE TASC FACILITY.

PROTECTED HEALTH INFORMATION TASC0000235

**TASC DRUG DETECTION LABORATORY**

4016 N. Black Canyon Hwy -- Phoenix, AZ 85017

CLIA# 03D0938729 / CAP-LAP# 3201701

DIRECTOR: Dr. Gerald Clement, Ph.D.



DONOR NAME: PASCALE, MARK
 ACCESSION NUMBER: 12003807
 COLLECTION DATE: 04/12/18 14:38
 RECEIVED DATE: 04/12/18 23:11
 REPORT DATE: 04/19/18 10:49
 REFERRED BY: GARCIA, VIVIANA

CLIENT ID: POM/B
 DONOR ID: Redacted 9808
 D.O.B.: Redacted /58 12:00:01
 TEST COLOR: IVR

SCREENING TESTS

TEST NAME	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
AMPHETAMINE	Negative		1000 NG/ML	EIA	URINE
COCAINE	Negative		300 NG/ML	EIA	URINE
ETHYL GLUCURONIDE	Negative		500 NG/ML	EIA	URINE
OPIATES	POSITIVE		2000 NG/ML	EIA	URINE
THC	Negative		50 NG/ML	EIA	URINE

CONFIRMATORY TESTS

ANALYTE	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
GCMS 6-MAM	Negative		10 NG/ML	GCMS	URINE
GCMS CODEINE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS MORPHINE	POSITIVE 4794 NG/ML		300 NG/ML	GCMS	URINE
GCMS OXYCODONE	POSITIVE 2682 NG/ML		300 NG/ML	GCMS	URINE
GCMS OXYMORPHONE	POSITIVE 692 NG/ML		300 NG/ML	GCMS	URINE

URINE VALIDITY TESTS

TEST NAME	TEST RESULT / INTERPRETATION	ACCEPTABLE RANGE
SPECIFIC GRAVITY	1.0142	1.003 or greater
CREATININE	131.5	20 mg/dL or greater

PROTECTED HEALTH INFORMATION TASC000236



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK	Account Code:	POM/B		
Accession #:	12003807	Donor Id :	Redacted 9808	DOB:	Redacted 1958
Collection Date:	4/12/2018 2:38:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	4/16/2018 2:37:57 PM
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(Signature)



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04/16/2018 MON 14:44

FAX

001

 *** FAX TX REPORT ***

TRANSMISSION OK

JOB NO. 2308
 DESTINATION ADDRESS 4808652079
 SUBADDRESS
 DESTINATION ID
 ST. TIME 04/16 14:44
 TX/RX TIME 00' 29
 PGS. 1
 RESULT OK



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK		Account Code:	POM/B	
Accession #:	12003807	Donor Id :	Redacted 19808	DOB:	Redacted 1958
Collection Date:	4/12/2018 2:38:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	4/16/2018 2:37:57 PM
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(Signature)



IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE AGENCY, PRINT THIS FORM AND
 IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE CLIENT, PLEASE PRINT THIS FORM
 AND PROVIDE TO THE CLIENT TO SUBMIT WITH PAYMENT AT THE TASC FACILITY.

PROTECTED HEALTH INFORMATION TASC000238

TASC DRUG DETECTION LABORATORY

2234 N. 7th Street -- Phoenix, AZ 85006
 CLIA# 03D0938729 / CAP-LAP# 3201701
 DIRECTOR: Dr. Gerald Clement, Ph.D.



DONOR NAME:	PASCALE, MARK	CLIENT ID:	POM/B
ACCESSION NUMBER:	11862803	DONOR ID:	Redacted 9808
COLLECTION DATE:	02/08/18 13:02	D.O.B.:	Redacted 58 12:00:01
RECEIVED DATE:	02/08/18 16:07	TEST COLOR:	IVR
REPORT DATE:	02/16/18 10:35		
REFERRED BY:	GARCIA, VIVIANA		

SCREENING TESTS

<u>TEST NAME</u>	<u>TEST RESULT / CONCENTRATION</u>	<u>NORMALIZED</u>	<u>CUTOFF LEVEL</u>	<u>METHOD</u>	<u>MEDIA</u>
AMPHETAMINE	Negative		1000 NG/ML	EIA	URINE
COCAINE	Negative		300 NG/ML	EIA	URINE
ETHYL GLUCURONIDE	Negative		500 NG/ML	EIA	URINE
OPIATES	POSITIVE		2000 NG/ML	EIA	URINE
THC	Negative		50 NG/ML	EIA	URINE

CONFIRMATORY TESTS

<u>ANALYTE</u>	<u>TEST RESULT / CONCENTRATION</u>	<u>NORMALIZED</u>	<u>CUTOFF LEVEL</u>	<u>METHOD</u>	<u>MEDIA</u>
GCMS CODEINE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS OXYCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS OXYMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS MORPHINE	POSITIVE 1391 NG/ML		300 NG/ML	GCMS	URINE

URINE VALIDITY TESTS

<u>TEST NAME</u>	<u>TEST RESULT / INTERPRETATION</u>	<u>ACCEPTABLE RANGE</u>
SPECIFIC GRAVITY	1.0112	1.003 or greater
CREATININE	101.7	20 mg/dL or greater

PROTECTED HEALTH INFORMATION TASC000239

 *** FAX TX REPORT ***

TRANSMISSION OK

JOB NO. 1609
 DESTINATION ADDRESS 4808652079
 SUBADDRESS
 DESTINATION ID
 ST. TIME 02/14 14:37
 TX/RX TIME 00' 29
 PGS. 1
 RESULT OK



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK		Account Code:	POM/B	
Accession #:	11862803	Donor Id :	Redacted 9808	DOB:	Redacted 1958
Collection Date:	2/8/2018 1:02:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	2/14/2018 2:31:39 PM
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(Signature)



IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE AGENCY, PRINT THIS FORM AND FAX TO 480-865-2079.
 IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE CLIENT, PLEASE PRINT THIS FORM AND PROVIDE TO THE CLIENT TO SUBMIT WITH PAYMENT AT THE TASC FACILITY.

PROTECTED HEALTH INFORMATION TASC000240



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK	Account Code:	POM/B		
Accession #:	11862803	Donor Id :	Redacted 9808	DOB:	Redacted 58
Collection Date:	2/8/2018 1:02:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	2/14/2018 2:31:39 PM
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(Signature)



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TASC DRUG DETECTION LABORATORY

2234 N. 7th Street -- Phoenix, AZ 85006
 CLIA# 03D0938729 / CAP-LAP# 3201701
 DIRECTOR: Dr. Gerald Clement, Ph.D.



DONOR NAME: PASCALE, MARK
 ACCESSION NUMBER: 11801559
 COLLECTION DATE: 01/11/18 17:53
 RECEIVED DATE: 01/11/18 22:43
 REPORT DATE: 01/26/18 11:15
 REFERRED BY: GARCIA, VIVIANA

CLIENT ID: POM/B
 DONOR ID: Redacted 3808
 D.O.B.: Redacted 58 12:00:01
 TEST COLOR: IVR

SCREENING TESTS

TEST NAME	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
AMPHETAMINE	Negative		1000 NG/ML	EIA	URINE
COCAINE	Negative		300 NG/ML	EIA	URINE
ETHYL GLUCURONIDE	Negative		500 NG/ML	EIA	URINE
OPIATES	POSITIVE		2000 NG/ML	EIA	URINE
THC	Negative		50 NG/ML	EIA	URINE

CONFIRMATORY TESTS

ANALYTE	TEST RESULT / CONCENTRATION	NORMALIZED	CUTOFF LEVEL	METHOD	MEDIA
GCMS CODEINE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROCODONE	Negative		300 NG/ML	GCMS	URINE
GCMS HYDROMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS OXYMORPHONE	Negative		300 NG/ML	GCMS	URINE
GCMS MORPHINE	POSITIVE 5869 NG/ML		300 NG/ML	GCMS	URINE
GCMS OXYCODONE	POSITIVE 3843 NG/ML		300 NG/ML	GCMS	URINE
GCMS 6-MAM	Negative		10 NG/ML	GCMS	URINE

URINE VALIDITY TESTS

TEST NAME	TEST RESULT / INTERPRETATION	ACCEPTABLE RANGE
SPECIFIC GRAVITY	1.0052	1.003 or greater
CREATININE	76.2	20 mg/dL or greater

PROTECTED HEALTH INFORMATION TASC000242

01/24/2018 WED 09:37

FAX

001

 *** FAX TX REPORT ***

TRANSMISSION OK

JOB NO. 1381
 DESTINATION ADDRESS 4808652079
 SUBADDRESS
 DESTINATION ID
 ST. TIME 01/24 09:37
 TX/RX TIME 00' 29
 PGS. 1
 RESULT OK



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK		Account Code:	POM/B	
Accession #:	11801559	Donor Id:	Redacted 9808	DOB:	Redacted 58
Collection Date:	1/11/2018 5:53:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	1/24/2018 9:30:24 AM
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(Signature)



IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE AGENCY, PRINT THIS FORM AND
 FAX TO 480-865-2079.
 IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE CLIENT, PLEASE PRINT THIS FORM
 AND PROVIDE TO THE CLIENT TO SUBMIT WITH PAYMENT AT THE TASC FACILITY.

TASC000243



CONFIRMATION REQUEST

SAMPLE INFORMATION					
Donor Name:	PASCALE, MARK		Account Code:	POM/B	
Accession #:	11801559	Donor Id :	Redacted 9808	DOB:	Redacted 58
Collection Date:	1/11/2018 5:53:00 PM				
Requesting Agency:	TASC Diversion				
Drugs to be confirmed:	OPI				
Billing Type:	PREPAY				

Approving Agency Contact Person:	GARCIA, VIVIANA	Date:	1/24/2018 9:30:24 AM
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(Signature)



IF THIS CONFIRMATION AUTHORIZATION IS PAID BY THE AGENCY, PRINT THIS FORM AND FAX TO 480-865-2079.
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Dr. Viviana Garcia **From Mark Pascale**

Medical Expenses
 Dates: 06/25/2018 to 06/25/2018

DOB: 09-58 Redacted
 Pharmacy: SAFEWAY #17-1841
 12320 N 83RD AVENUE
 PEORIA
 AZ 85381

NCPDP: 0326264
 Pharmacist: Bazzano, Steven

13051 N 75th Dr
 Peoria, AZ 85381-4005

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
2018-06-25	2021074	1574151	Morphine Sulfate Er 15 Mg		60951065270	30.0	30	\$	\$ 0.00
ON, HON S : Arizona Physicians Apipa ID: A4530085 : 181754053258084996 Received Amount: \$ 6.25									
2018-06-25	2021075	1574153	Oxycodone Hcl 30 Mg		00406853001	120.0	30	\$	\$ 0.00
ON, HON S : Arizona Physicians Apipa ID: A4530085 : 181754053258084996 Received Amount: \$ 27.17									
Plan: OPTUM RX Prior Auth #:									
Plan: OPTUM RX Prior Auth #:									
Total Patient Pay: \$0.00 Third Party Recv: \$33.42 Attested By: _____ Registered Pharmacist									

MEDICAL EXPENSES

Page 1

Patient : Pascale Mark	Pharmacy: SAFEWAY #17-1841
	12320 N 83RD AVENUE
RespPty :	PEORIA, AZ 85381
13051 N 75th Dr	RPh: England
	Katie L
Peoria, AZ 85381-4005	NCPDP#: 0326264
Birth: Redacted5g	

Prescriptions: Dates : 03/01/2018 TO 05/05/2018

LastFill	Rx #	Drug Name	Qty	T/P	Price	RPh
Physician Name						
03/02/2018	6196580	Escitalopram Oxalate 10 Mg	Tab Acco	10	MAZ	\$0.00 CH
TOBIN, CYNTHIA K						
03/02/2018	6196580	Escitalopram Oxalate 10 Mg	Tab Myla	20		\$0.00 CH
TOBIN, CYNTHIA K						
03/02/2018	4029365	Clonazepam 1 Mg	Tab Nort	14	MAZ	\$0.00 CH
REINHART, JASON C						
03/05/2018	6196684	Lantus Solostar 100 Unit/MI	Inj Sano	15	MAZ	\$0.00 CH
ARPINO, GIROLAMO J						
03/05/2018	6196687	Bd Pen Needle Nano U/F 32g X 4 Mm	Mis Bd D	100	MAZ	\$0.00 CH
ARPINO, GIROLAMO J						
03/06/2018	6179899	Montelukast Sodium 10 Mg	Tab Krem	30	MAZ	\$0.00 SB
ARPINO, GIROLAMO J						
03/09/2018	4029385	Clonazepam 1 Mg	Tab Nort	34	MAZ	\$0.00 KLE
LENYARD, BONNIE S						
03/10/2018	6196962	Shingrix 50 Mcg	Inj Glax	1	MAZ	\$0.00 KLE
ENGLAND, KATIE L						
03/12/2018	6197028	Gabapentin 300 Mg	Cap Nort	90	MAZ	\$0.00 CH
GLEICHMAN, VICTORIA J						
03/12/2018	6197029	Cyclobenzaprine Hcl 10 Mg	Tab Solc	90	MAZ	\$0.00 CH
GLEICHMAN, VICTORIA J						
03/12/2018	6197031	Clonidine Hcl 0.1 Mg	Tab Acta	28	MAZ	\$0.00 CH
GLEICHMAN, VICTORIA J						
03/13/2018	6197032	Promethazine Hcl 12.5 Mg	Tab Amne	21	MAZ	\$0.00 CH
GLEICHMAN, VICTORIA J						
03/15/2018	6197030	Nabumetone 500 Mg	Tab Glen	60	MAZ	\$0.00 CH
GLEICHMAN, VICTORIA J						

M E D I C A L E X P E N S E S

Page 2

Patient : Pascale Mark
 RespPty : 13051 N 75th Dr
 Peoria, AZ 85381-4005
 Birth: **Redacted**;g

Pharmacy: SAFEWAY #17-1841
 12320 N 83RD AVENUE
 PEORIA, AZ 85381
 RPh: England
 Katie L
 NCPDP#: 0326264

Prescriptions: Dates : 03/01/2018 TO 05/05/2018

LastFill	Rx #	Drug Name	Qty	T/P	Price	RPh
Physician Name						
03/18/2018	6181348	Lisinopril 30 Mg	Tab Solc	30	MAZ	\$0.00 CH
ARPINO, GIROLAMO J						
03/21/2018	6196581	Rozerein 8 Mg	Tab Take	30	MAZ	\$0.00 CH
TOBIN, CYNTHIA K						
03/21/2018	6196579	Hydroxyzine Hcl 50 Mg	Tab Nort	90	MAZ	\$0.00 CH
TOBIN, CYNTHIA K						
03/26/2018	2020513	Morphine Sulfate Er 15 Mg	Tab Endo	30	MAZ	\$0.00 CH
UHRIK, OTTO						
03/26/2018	2020512	Oxycodone Hcl 30 Mg	Tab Mall	118	MAZ	\$0.00 CH
UHRIK, OTTO						
03/26/2018	2020512	Oxycodone Hcl 30 Mg	Tab Sunp	2		\$0.00 CH
UHRIK, OTTO						
03/28/2018	6196580	Escitalopram Oxalate 10 Mg	Tab Acco	30	MAZ	\$0.00 KLE
TOBIN, CYNTHIA K						
03/28/2018	6192267	Pantoprazole Sodium Ec 40 Mg	Tab Auro	60	MAZ	\$0.00 ~BG
ARPINO, GIROLAMO J						
04/03/2018	6184267	Jardiance 25 Mg	Tab Boeh	30	MAZ	\$0.00 KLE
ARPINO, GIROLAMO J						
04/03/2018	6192268	Januvia 100 Mg	Tab Merc	30	MAZ	\$0.00 KLE
ARPINO, GIROLAMO J						
04/03/2018	6192265	Pioglitazone Hcl 45 Mg	Tab Maci	30	MAZ	\$0.00 KLE
ARPINO, GIROLAMO J						
04/03/2018	6194594	Glipizide 5 Mg	Tab Sand	60	MAZ	\$0.00 KLE
ARPINO, GIROLAMO J						
04/07/2018	6179899	Montelukast Sodium 10 Mg	Tab Camb	30	MAZ	\$0.00 KLE
ARPINO, GIROLAMO J						

PROTECTED HEALTH INFORMATION

TASC000247

MEDICAL EXPENSES

Page 3

Patient : Pascale
Mark
RespPty :
13051 N 75th Dr
Peoria, AZ 85381-4005
Birth : Redacted 58

Pharmacy: SAFEWAY #17-1841
12320 N 83RD AVENUE
PEORIA, AZ 85381
RPh: England
Katie L
NCPDP#: 0326264

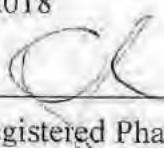
Prescriptions: Dates : 03/01/2018 TO 05/05/2018

LastFill	Rx #	Drug Name	Qty	T/P	Price	RPh
Physician Name						
04/10/2018	6197637	Cyclobenzaprine Hcl 10 Mg	Tab Solc	90	MAZ	\$0.00 CH
UHRIK, OTTO						
04/10/2018	4029503	Clonazepam 1 Mg	Tab Nort	27	MAZ	\$0.00 CH
REINHART, JASON C						
04/12/2018	6198627	Topiramate 25 Mg	Tab Zydu	21	MAZ	\$0.00 KLE
REINHART, JASON C						
04/12/2018	6198628	Topiramate 50 Mg	Tab Cipl	45	MAZ	\$0.00 KLE
REINHART, JASON C						
04/19/2018	6181348	Lisinopril 30 Mg	Tab Solc	30	MAZ	\$0.00 CH
ARPINO, GIROLAMO J						
04/23/2018	6196579	Hydroxyzine Hcl 50 Mg	Tab Nort	90	MAZ	\$0.00 CH
TOBIN, CYNTHIA K						
04/26/2018	2020734	Morphine Sulfate Er 15 Mg	Tab Endo	30	MAZ	\$0.00 KLE
WILSON, HYON S						
04/26/2018	6199315	Gabapentin 300 Mg	Cap Nort	60	MAZ	\$0.00 KLE
WILSON, HYON S						
04/26/2018	2020735	Oxycodone Hcl 30 Mg	Tab Mall	120	MAZ	\$0.00 KLE
WILSON, HYON S						
04/30/2018	6184272	Prochlorperazine Maleate 10 Mg	Tab Cadi	90	MAZ	\$0.00 CH
ARPINO, GIROLAMO J						

Report Date: 05/05/2018

\$0.00

Attested By:


 Registered Pharmacist

 MEDICAL EXPENSES

Page 4

Patient : Pascale
 Mark

Pharmacy: SAFEWAY #17-1841
 12320 N 83RD AVENUE
 PEORIA, AZ 85381

RespPty :
 13051 N 75th Dr

RPh: England
 Katie L

Peoria, AZ 85381-4005

NCPDP#: 0326264

Birth: Redacted₅₈

Prescriptions:

Dates : 03/01/2018 TO 05/05/2018

LastFill	Rx #	Drug Name	Qty	T/P	Price	RPh
Physician Name						

Medical Expenses

Dates: 01/01/2018 to 04/09/2018

Patient: Pascale
Mark
13051 N 75th Dr
Peoria, AZ 85381-4005

DOB:

58
Redacted

Pharmacy: SAFEWAY #17-1841
12320 N 83RD AVENUE
PEORIA
AZ 85381
NCPDP: 0326264
Pharmacist: Hibben,
Crystal

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
RR/RN	scriber				U & C Price			
2018	6184267	1544385	Jardiance 25 Mg	FA1459191	00597015330	30.0	30	\$ 0.00
4 / 5					\$			
INO, GIROLAMO J								
2018	6187192	1544996	Atorvastatin Calcium 10 Mg	FA1459191	60505257809	30.0	30	\$ 0.00
/ 3					\$			
INO, GIROLAMO J								
2018	4029153	1545818	Tramadol Hcl 50 Mg	FA1459191	16714048101	240.0	30	\$ 17.59
/ 0					\$			
JAN PATRICK W								
2018	2019968	1546078	Morphine Sulfate Er 15 Mg	FH0182333	60951065270	30.0	30	\$ 0.00
/ 0					\$			
JAN PATRICK W								
2018	2019969	1546079	Oxycodone Hcl 30 Mg	FH0182333	00406853001	120.0	30	\$ 0.00
/ 0					\$			
JAN PATRICK W								
2018	6193835	1546592	Cyclobenzaprine Hcl 10 Mg	FH0182333	43547040011	90.0	30	\$ 0.00
/ 0					\$			
JAN PATRICK W								
2018	6192268	1546699	Januvia 100 Mg	FH0182333	00006027731	30.0	30	\$ 0.00
3 / 1					\$			
INO, GIROLAMO J								

PROTECTED HEALTH INFORMATION TAGC00025

Bill Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
15/2018	6192267	1546700	Pantoprazole Sodium Ec 40 Mg	65862056090	60.0	30	\$	\$ 0.00
12/1								
15/2018	6191477	1548247	Hydroxyzine Hcl 50 Mg	16714008310	90.0	30	\$	\$ 0.00
10/2								
12/2019	6194594	1548409	Glipizide 5 Mg	00781145210	60.0	30	\$	\$ 0.00
11/10								
12/2019	6191478	1548567	Rozemer 8 Mg	64764080530	30.0	30	\$	\$ 0.00
10/2								
12/2019	6194670	1548679	Bd Pen Needle Mini U/F 31g X 5 Mm	08290320119	100.0	30	\$	\$ 0.00
15/0								
12/2019	6194671	1548681	Lantus Solostar 100 Unit/Ml	00088221905	15.0	31	\$	\$ 0.00
10/0								
12/2019	4028982	1548778	Clonazepam 1 Mg	16714075001	60.0	30	\$	\$ 0.00
10/2								
12/2019	6194728	1548831	Qvar 80 Mcg/Act	59310020412	8.7	31	\$	\$ 0.00
15/0								

PROTECTED HEALTH INFORMATION

ASC 00051

II Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	Final Patient Copay
A/RR/RN				U & C Price			
rescriber			Prescriber ID				
2/27/2018	6181348	1548992	Lisinopril 30 Mg	00185063001	30.0	30	\$ 0.00
2/27/2018				\$			
RPINO, GIROLAMO J			FA1459191				
3/30/2018	6179899	1549495	Montelukast Sodium 10 Mg	62175021032	30.0	30	\$ 0.00
3/30/2018				\$			
RPINO, GIROLAMO J			FA1459191				
3/30/2018	6184267	1550396	Jardiance 25 Mg	00597015330	30.0	30	\$ 0.00
3/30/2018				\$			
RPINO, GIROLAMO J			FA1459191				
5/20/2018	6187192	1550872	Atorvastatin Calcium 10 Mg	59762015501	30.0	30	\$ 0.00
5/20/2018				\$			
RPINO, GIROLAMO J			FA1459191				
6/20/2018	6195378	1551057	Amox/K Clav 500-125	16714049401	30.0	10	\$ 0.00
6/20/2018				\$			
RPINO, GIROLAMO J			FA1459191				
9/20/2018	2020192	1551637	Morphine Sulfate Er 15 Mg	60951065270	30.0	30	\$ 0.00
9/20/2018				\$			
IOGAN PATRICK W			FH0182333				
9/20/2018	2020193	1551638	Oxycodone Hcl 30 Mg	00406853001	120.0	30	\$ 0.00
9/20/2018				\$			
IOGAN PATRICK W			FH0182333				
2/13/2018	6195425	1552254	Cyclobenzaprine Hcl 10 Mg	43547040011	83.0	28	\$ 0.00
2/13/2018				\$			
IOGAN PATRICK W			FH0182333				

ill Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	Final Patient Copay
A/RR/RN				U & C Price			
rescriber			Prescriber ID				
13/2018	6195425	1552253	Cyclobenzaprine Hcl 10 Mg	00378075110	7.0	2	\$ 0.00
10/0				\$			
OGAN PATRICK W			FH0182333				
16/2018	4029308	1552847	Tramadol Hcl 50 Mg	16714048101	240.0	30	\$ 17.59
10/0				\$			
OGAN PATRICK W			FH0182333				
19/2018	6184272	1553266	Prochlorperazine Maleate 10 Mg	59746011506	90.0	30	\$ 0.00
1/8/19				\$			
RPINO, GIROLAMO J			FA1459191				
19/2018	6192267	1553267	Pantoprazole Sodium Ec 40 Mg	65862056090	60.0	30	\$ 0.00
1/2/19				\$			
RPINO, GIROLAMO J			FA1459191				
23/2018	6196204	1554008	Rozemer 8 Mg	64764080530	30.0	30	\$ 0.00
10/0				\$			
DBIN, CYNTHIA K			MT0682927				
23/2018	6196205	1554009	Hydroxyzine Hcl 50 Mg	16714008310	90.0	30	\$ 0.00
10/0				\$			
DBIN, CYNTHIA K			MT0682927				
26/2018	6192268	1554370	Januvia 100 Mg	00006027731	30.0	30	\$ 0.00
1/8/19				\$			
RPINO, GIROLAMO J			FA1459191				
2/2019	6196580	1555206	Escitalopram Oxalate 10 Mg	16729016901	10.0	10	\$ 0.00
1/1/0				\$			
DBIN, CYNTHIA K			MT0682927				

PROTECTED HEALTH INFORMATION

ASC 00053

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
2/2018	6196580	1555205	Escitalopram Oxalate 10 Mg	MT0682927	51079054320	20.0	20	\$ 0.00
1/2018					\$			
BIN, CYNTHIA K								
2/2018	4029365	1555274	Clonazepam 1 Mg	MT0682927	16714075001	14.0	7	\$ 0.00
2/2018					\$			
NHART, JASON C				BR7655701				
2/2018	6196684	1555705	Lantus Solostar 100 Unit/MI		00088221905	15.0	31	\$ 0.00
2/2018					\$			
PINO, CAROLAMO J				FA1459191				
2/2018	6196687	1555711	Bd Pen Needle Nano U/F 32g X 4 Mm Mis Bd D		08290320122	100.0	30	\$ 0.00
3/2018					\$			
PINO, CAROLAMO J				FA1459191				
2/2018	6179899	1555974	Montelukast Sodium 10 Mg		62175021032	30.0	30	\$ 0.00
2/2018					\$			
PINO, CAROLAMO J				FA1459191				
2/2018	4029385	1556512	Clonazepam 1 Mg		16714075001	34.0	30	\$ 0.00
2/2018					\$			
YARD, BONNIE S				ML3239882				
2/2018	6196962	1556615	Shingrix 50 Mcg		58160082311	1.0	1	\$ 0.00
2/2018					\$			
BLAND, KATIE L								
2/2018	6197028	1556830	Gabapentin 300 Mg		16714050402	90.0	30	\$ 0.00
2/2018					\$			
UCHMAN, VICTORIA J				MG3488346				

Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	Final Patient Copay
RR/RN	scriber	scriber	Prescriber ID	U & C Price			
2/2018	6197029	1556832	Cyclobenzaprine Hcl 10 Mg	43547040011	90.0	30	\$ 0.00
3/0				\$			
EICHMAN, VICTORIA J			MG3488346				
2/2018	6197031	1556835	Clonidine Hcl 0.1 Mg	00228212710	28.0	7	\$ 0.00
3/0				\$			
EICHMAN, VICTORIA J			MG3488346				
3/2018	6197032	1557046	Promethazine Hcl 12.5 Mg	65162074510	21.0	3	\$ 0.00
0/0				\$			
EICHMAN, VICTORIA J			MG3488346				
5/2018	6197030	1557441	Nabumetone 500 Mg	68462035805	60.0	30	\$ 0.00
0/0				\$			
EICHMAN, VICTORIA J			MG3488346				
8/2018	6181348	1557891	Lisinopril 30 Mg	43547041810	30.0	30	\$ 0.00
1/1				\$			
PINE, GIROLAMO J			FA1459191				
1/2019	6196581	1555186	Rozemer 8 Mg	64764080530	30.0	30	\$ 0.00
2/0				\$			
BIN, CYNTHIA K			MT0682927				
1/2019	6196579	1555183	Hydroxyzine Hcl 50 Mg	16714008310	90.0	30	\$ 0.00
2/0				\$			
BIN, CYNTHIA K			MT0682927				
6/2019	2020513	1559093	Morphine Sulfate Er 15 Mg	60951065270	30.0	30	\$ 0.00
0/0				\$			
RIK, OTTO			BU7384744				

PROTECTED HEALTH INFORMATION

ASC000551

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
RRR/RN					U & C Price			
2/18	2020512	1559095	Oxycodone Hcl 30 Mg	BU7384744	57664022488	2.0	1	\$ 0.00
/0					\$			
IK, OTTO								
2/18	2020512	1559096	Oxycodone Hcl 30 Mg	BU7384744	00406853001	118.0	29	\$ 0.00
/0					\$			
IK, OTTO								
2/18	6196580	1559531	Escitalopram Oxalate 10 Mg	BU7384744	16729016901	30.0	30	\$ 0.00
/1					\$			
IN, CYATHIA K								
2/18	6192267	1559619	Pantoprazole Sodium Ec 40 Mg	MT0682927	65862056090	60.0	30	\$ 0.00
/3					\$			
INO, GIROLAMO J								
2/18	6184267	1560599	Jardiance 25 Mg	FA1459191	00597015330	30.0	30	\$ 0.00
4/7					\$			
INO, GIROLAMO J								
2/18	6192268	1560597	Januvia 100 Mg	FA1459191	00006027731	30.0	30	\$ 0.00
3/3					\$			
INO, GIROLAMO J								
2/18	6192265	1560600	Pioglitazone Hcl 45 Mg	FA1459191	33342005607	30.0	30	\$ 0.00
10/1					\$			
INO, GIROLAMO J								
2/18	6194594	1560598	Glipizide 5 Mg	FA1459191	00781145210	60.0	30	\$ 0.00
10/1					\$			
INO, GIROLAMO J								

Total Patient Pay: \$35.18

Attested By: _____
Registered Pharmacist

TASC000257

Medical Expenses

Dates: 01/01/2018 to 01/22/2018

Patient: Pascale
Mark
13051 N 75th Dr
Peoria, AZ 85381-4005

DOB: 58
Redacted

Pharmacy: SAFEWAY #17-1841
12320 N 83RD AVENUE
PEORIA
AZ 85381
NCPDP: 0326264
Pharmacist: Hibben,
Crystal

Date RR/RRN	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
2/2018 /6 / 5	6184267	1544385	Jardiance 25 Mg	FA1459191	00597015330	30.0	30	\$	\$ 0.00
PINO, GIROLAMO J									
2/2018 2 / 3	6187192	1544996	Atorvastatin Calcium 10 Mg	FA1459191	60505257809	30.0	30	\$	\$ 0.00
PINO, GIROLAMO J									
2/2018 0 / 0	4029153	1545818	Tramadol Hcl 50 Mg	FA1459191	16714048101	240.0	30	\$	\$ 17.59
OGAN, PATRICK W									
1/2018 0 / 0	2019968	1546078	Morphine Sulfate Er 15 Mg	FH0182333	60951065270	30.0	30	\$	\$ 0.00
OGAN, PATRICK W									
1/2018 0 / 0	2019969	1546079	Oxycodone Hcl 30 Mg	FH0182333	00406853001	120.0	30	\$	\$ 0.00
OGAN, PATRICK W									
4/2018 0 / 0	6193835	1546592	Cyclobenzaprine Hcl 10 Mg	FH0182333	43547040011	90.0	30	\$	\$ 0.00
OGAN, PATRICK W									
5/2018 / 10 / 1	6192268	1546699	Januvia 100 Mg	FH0182333	00006027731	30.0	30	\$	\$ 0.00
PINO, GIROLAMO J									

PROTECTED HEALTH INFORMATION TAC000258

late	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	Final Patient Copay
scriber				U & C Price			
2018	6192267	1546700	Pantoprazole Sodium Ec 40 Mg	65862056090	60.0	30	\$ 0.00
/ 1			Tab Auro	\$			
INO, GIROLAMO J			FA1459191				

ort Date: 01/22/2018

Total Patient Pay: \$17.59

Attested By:

Registered Pharmacist

PROTECTED HEALTH INFORMATION

TASC000259

Medical Expenses

Dates: 05/30/2017 to 10/30/2017

Patient: Pascale
Mark

DOB:

J58
RedactedPharmacy: SAFEWAY #17-1841
12320 N 83RD AVENUE
PEORIA
AZ 85381

13051 N 75th Dr

Peoria, AZ 85381-4005

NCPDP: 0326264
Pharmacist: Hibben,
Crystal

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	U & C Price	DaysSupply	Final Patient Copay
2017	6169750	1503777	Ibuprofen 800 Mg	Tab Majo	00904585540	90.0		30	
11/2					\$				\$ 0.00
2017	6174179	1508060	Januvia 100 Mg	Tab Merc	00006027731	30.0		30	
11/6					\$				\$ 0.00
2017	6175719	1508058	Pioglitazone Hcl 30 Mg	Tab Acco	16729002110	30.0		30	
11/5					\$				\$ 0.00
2017	6179897	1508061	Atorvastatin Calcium 20 Mg	Tab Apot	60505257909	30.0		30	
11/2					\$				\$ 0.00
2017	6179899	1508059	Montelukast Sodium 10 Mg	Tab Krem	62175021032	30.0		30	
5/2					\$				\$ 0.00
2017	6181348	1508170	Lisinopril 30 Mg	Tab Sand	00185063001	30.0		30	
5/1					\$				\$ 0.00
2017	6179901	1508411	Pantoprazole Sodium Ec 40 Mg	Tab Auro	6586205090	60.0		30	
11/1					\$				\$ 0.00
2017	6179901	1508411	Pantoprazole Sodium Ec 40 Mg	Tab Auro	6586205090	60.0		30	
11/1					\$				\$ 0.00

PROTECTED HEALTH INFORMATION TASC000260

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
017	6180378	1508412	Hydroxyzine Hcl 50 Mg	MP1704421	16714008310	90.0	30	\$ 0.00
017	6175364	1508540	Invokana 300 Mg	MP1704421	50458014130	30.0	30	\$ 0.00
017	4028114	1508990	Clonazepam 1 Mg	FA1459191	16714047001	60.0	30	\$ 0.00
017	2018515	1509070	Oxycodone Hcl 30 Mg	BR7655701	68308011201	120.0	30	\$ 0.00
017	6182940	1509071	Morphine Sulfate Er 15 Mg	MJ1864203	60951065270	30.0	30	\$ 0.00
017	6182940	1509072	Cyclobenzaprine Hcl 10 Mg	MJ1864203	00378075110	90.0	30	\$ 0.00
017	6182941	1509073	Gabapentin 300 Mg	MJ1864203	16714050402	60.0	30	\$ 0.00
017	4027781	1509558	Testosterone Cypionate 200 Mg/ML	MJ1864203	00574082001	4.0	28	\$ 0.00
017	4027781	1509558	Testosterone Cypionate 200 Mg/ML	AG2282945	00574082001	4.0	28	\$ 0.00

PROTECTED HEALTH INFORMATION

TASC000261

Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
12/17/2017	4028316	1511512	Tramadol Hcl 50 Mg	MJ1864203	16714048103	240.0	30	\$ 17.59
12/17/2017	6183388	1511521	Trazodone Hcl 150 Mg	MJ1864203	53489051701	30.0	30	\$ 0.00
12/17/2017	6178642	1508200	Ibuprofen 800 Mg	BC1013729	67877032105	90.0	30	\$ 0.00
12/17/2017	6174179	1513023	Januvia 100 Mg	MJ1864203	00006027731	30.0	30	\$ 0.00
12/17/2017	6180378	1513018	Hydroxyzine Hcl 50 Mg	FA1459191	16714008310	90.0	30	\$ 0.00
12/17/2017	6181348	1513020	Lisinopril 30 Mg	MP1704421	00185063001	30.0	30	\$ 0.00
12/17/2017	6179897	1513022	Atorvastatin Calcium 20 Mg	FA1459191	60505257909	30.0	30	\$ 0.00
12/17/2017	6179901	1513019	Pantoprazole Sodium Ec 40 Mg	FA1459191	65862056090	60.0	30	\$ 0.00

Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
1/2017	6179899	1513031	Montelukast Sodium 10 Mg	62175021032	30.0	30	\$	\$ 0.00
1/5/3								
PINO, GIROLAMO J								
1/2017	4028114	1513069	Clonazepam 1 Mg	16714047001	60.0	30	\$	\$ 0.00
0/2								
INHART, JASON C								
1/2017	6180539	1513070	Glipizide 5 Mg	00781145210	30.0	30	\$	\$ 0.00
3/1								
PINO, GIROLAMO J								
1/2017	6181450	1513072	Gabapentin 300 Mg	16714050402	60.0	30	\$	\$ 0.00
1/0								
OGAN, PATRICK W								
1/2017	6184082	1513465	Cyclobenzaprine Hcl 10 Mg	00378075110	90.0	30	\$	\$ 0.00
0/0								
CKSON, ROBIN E								
1/2017	2018728	1513466	Oxycodone Hcl 30 Mg	57664022488	120.0	30	\$	\$ 0.00
1/1/NR70								
CKSON, ROBIN E								
1/2017	2018729	1513467	Morphine Sulfate Er 15 Mg	60951065270	30.0	30	\$	\$ 0.00
1/1/NR80								
CKSON, ROBIN E								
1/2017	4027781	1514039	Testosterone Cypionate 200 Mg/ML	00574082001	4.0	28	\$	\$ 0.00
0/5								
OLDMAN, IAN L								

PROTECTED HEALTH INFORMATION TASC000263

Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply
RR/RN				U & C Price		Final Patient Copay
scriber			Prescriber ID			
1/2017	6170589	1514040	Metformin Hcl 1,000 Mg	23155010401	60.0	30
3 / 1				\$		\$ 0.00
PINO, GIROLAMO J			FA1459191			
1/2017	6184270	1514088	Pioglitazone Hcl 30 Mg	33342005507	30.0	30
'9 / 0				\$		\$ 0.00
PINO, GIROLAMO J			FA1459191			
1/2017	6184272	1514090	Prochlorperazine Maleate 10 Mg	59746011506	90.0	30
'10 / 0				\$		\$ 0.00
PINO, GIROLAMO J			FA1459191			
3/2017	6184267	1514461	Jardiance 25 Mg	00597015330	30.0	30
'9 / 0				\$		\$ 0.00
PINO, GIROLAMO J			FA1459191			
8/2017	6184271	1514091	Glipizide 5 Mg	00781145210	60.0	30
'11 / 0				\$		\$ 0.00
PINO, GIROLAMO J			FA1459191			
5/2017	6174393	1513030	Ibuprofen 800 Mg	53746046605	90.0	30
2 / 0				\$		\$ 0.00
GAN PATRICK W			FH0182333			
1/2017	6180379	1517760	Trazodone Hcl 150 Mg	53489051701	30.0	30
1 / 1				\$		\$ 0.00
LY, Stephen E			MP1704421			
1/2017	6183390	1517759	Hydroxyzine Hcl 50 Mg	16714008310	90.0	30
0 / 0				\$		\$ 0.00
LLESEN, MARK T			BC1013729			

PROTECTED HEALTH INFORMATION

TASC000264

Ill Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay
A/RR/RN	prescriber				U & C Price			
5/2017	6185182	1517371	Cyclobenzaprine Hcl 10 Mg	FH0182333	00378075110	42.0	14	\$ 0.00
10/0					\$			
OGAN PATRICK W								
5/2017	2018928	1518045	Morphine Sulfate Er 15 Mg	FH0182333	60951065270	10.0	10	\$ 0.00
10/0					\$			
DWE, VAUGHN T								
5/2017	2018927	1518048	Oxycodone Hcl 30 Mg	MH0881967	68308011201	40.0	10	\$ 0.00
10/0					\$			
DWE, VAUGHN T								
5/2017	4028508	1518049	Tramadol Hcl 50 Mg	MH0881967	16714048103	240.0	30	\$ 17.59
10/0					\$			
ACKSON, ROBIN E								
5/2017	6170590	1518162	Sucralfate 1 Gm	MJ1864203	00591389205	120.0	30	\$ 0.00
10/2					\$			
RPINO, GIROLAMO J								
5/2017	6179897	1518161	Atorvastatin Calcium 20 Mg	FA1459191	60505257909	30.0	30	\$ 0.00
10/4					\$			
RPINO, GIROLAMO J								
5/2017	6181348	1518163	Lisinopril 30 Mg	FA1459191	00185063001	30.0	30	\$ 0.00
10/5					\$			
RPINO, GIROLAMO J								
5/2017	4028511	1518196	Clonazepam 1 Mg	FA1459191	16714047001	60.0	30	\$ 0.00
10/0					\$			
ENHART, JASON C								

PROTECTED HEALTH INFORMATION

TASC000265

Fill Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply
RA/RR/RN					U & C Price		Final Patient Copay
Prescriber							
3/6/2017	6185395	1518212	Fluarix Quadrivalent 0.5 Ml	Inj Glax	58160090752	0.5	1
0/0/0					\$		\$ 0.00
HIBBEN, CRYSTAL R							
3/6/2017	6185396	1518213	Pneumovax 23 25 Mcg/0.5ml	Inj Merc	00006483703	0.5	1
0/0/0					\$		\$ 0.00
HIBBEN, CRYSTAL R							
3/7/2017	6185390	1518198	Gabapentin 300 Mg	Cap Nort	16714050402	90.0	30
0/0/0					\$		\$ 0.00
JACKSON, ROBIN E							
				MJ1864203			
3/11/2017	4028539	1519331	Testosterone Cypionate 200 Mg/Ml	Inj Perr	00574082001	4.0	28
0/1/0					\$		\$ 0.00
GOLDMAN, IAN L							
				AG2282945			
3/13/2017	6180539	1519501	Glipizide 5 Mg	Tab Sand	00781145210	30.0	30
0/3/2					\$		\$ 0.00
ARPINO, GIROLAMO J							
				FA1459191			
3/13/2017	6179901	1519502	Pantoprazole Sodium Ec 40 Mg	Tab Auro	65862056090	60.0	30
0/0/3					\$		\$ 0.00
ARPINO, GIROLAMO J							
				FA1459191			
3/13/2017	6179899	1519500	Montelukast Sodium 10 Mg	Tab Krem	62175021032	30.0	30
1/5/1					\$		\$ 0.00
ARPINO, GIROLAMO J							
				FA1459191			
3/14/2017	6185908	1519667	Rozerem 8 Mg	Tab Take	64764080530	30.0	30
0/2/0					\$		\$ 0.00
OBIN, CYNTHIA K							
				MT0682927			

Fill Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply
RA/RR/RN	Prescriber				U & C Price		Final Patient Copay
1/14/2017	6185919	1519696	Hydroxyzine Hcl 50 Mg	MT0682927	16714008310	90.0	30
1/10/0					\$		\$ 0.00
1/14/2017	2018979	1519720	Oxycodone Hcl 30 Mg		57664022488	120.0	30
1/10/0					\$		\$ 0.00
1/14/2017	2018978	1519719	Morphine Sulfate Er 15 Mg	FH0182333	60951065270	30.0	30
1/10/0					\$		\$ 0.00
1/17/2017	6185925	1519736	Cyclobenzaprine Hcl 10 Mg	FH0182333	00378075110	90.0	30
1/10/0					\$		\$ 0.00
1/11/19	6184270	1522862	Pioglitazone Hcl 30 Mg	FA1459191	33342005507	30.0	30
1/11/19					\$		\$ 0.00
1/3/2017	4028605	1522350	Clonazepam 1 Mg	BR7655701	16714047001	60.0	30
1/10/0					\$		\$ 0.00
1/5/2017	6179897	1523244	Atorvastatin Calcium 20 Mg		60505257909	30.0	30
1/5/0/0					\$		\$ 0.00
1/5/2017	6184267	1523287	Jardiance 25 Mg	FA1459191	00597015330	30.0	30
1/11/19					\$		\$ 0.00

I Date ARR/RN Prescriber	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	Final Patient Copay	
								U & C Price	
5/2017	4028625	1523313	Tramadol Hcl 50 Mg	FH0182333	16714048103	80.0	10	\$	\$ 7.80
0 / 0									
OGAN PATRICK W									
5/2017	4028626	1523314	Tramadol Hcl 50 Mg	MH0881967	16714048103	80.0	10	\$	\$ 7.80
0 / 0									
DWE, VAUGHN T									
1/2017	6187191	1524247	Pioglitazone Hcl 45 Mg	FA1459191	33342005607	30.0	30	\$	\$ 0.00
4 / 0									
PIPINO, GIROLAMO J									
1/2017	6187192	1524248	Atorvastatin Calcium 10 Mg	FA1459191	60505257809	30.0	30	\$	\$ 0.00
4 / 0									
PIPINO, GIROLAMO J									
1/2017	6187195	1524251	Creon Dr 36,000 Unit	FA1459191	00032301628	240.0	30	\$	\$ 0.00
4 / 0									
PIPINO, GIROLAMO J									
2/2017	6185919	1524348	Hydroxyzine Hcl 50 Mg	MT0682927	16714008310	90.0	30	\$	\$ 0.00
0 / 1									
BIN, CYNTHIA K									
2/2017	6179901	1524350	Pantoprazole Sodium Ec 40 Mg	FA1459191	65862056090	60.0	30	\$	\$ 0.00
0 / 4									
PIPINO, GIROLAMO J									
2/2017	6179899	1524349	Montelukast Sodium 10 Mg	FA1459191	00603465528	30.0	30	\$	\$ 0.00
1 / 5 / 50									
PIPINO, GIROLAMO J									

Fill Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply
RA/RR/RN				U & C Price		Final Patient Copay
Prescriber			Prescriber ID			
9/12/2017	6181348	1524351	Lisinopril 30 Mg	00185063001	30.0	30
10/5/14				\$		\$ 0.00
ARPINO, GIROLAMO J			FA1459191			
9/13/2017	6187337	1524642	Cyclobenzaprine Hcl 10 Mg	00378075110	90.0	30
0/0/00				\$		\$ 0.00
HOGAN PATRICK W			FH0182333			
9/13/2017	6187338	1524643	Gabapentin 300 Mg	16714050402	60.0	30
2/2/10				\$		\$ 0.00
HOGAN PATRICK W			FH0182333			
9/13/2017	6187339	1524644	Ibuprofen 800 Mg	53746046605	90.0	30
2/1/10				\$		\$ 0.00
HOGAN PATRICK W			FH0182333			
9/13/2017	2019166	1524645	Morphine Sulfate Er 15 Mg	60951065270	30.0	30
0/0/00				\$		\$ 0.00
HOGAN PATRICK W			FH0182333			
9/13/2017	2019167	1524646	Oxycodone Hcl 30 Mg	57664022488	120.0	30
0/0/00				\$		\$ 0.00
HOGAN PATRICK W			FH0182333			
9/16/2017	6174179	1525210	Januvia 100 Mg	00006027731	30.0	30
2/0/08				\$		\$ 0.00
ARPINO, GIROLAMO J			FA1459191			
9/27/2017	6186810	1522931	Pioglitazone Hcl 30 Mg	33342005507	30.0	30
6/6/90				\$		\$ 0.00
ARPINO, GIROLAMO J			FA1459191			

PROTECTED HEALTH INFORMATION TASC000069

IL Date	Rx#	Tx#	Drug Name	Prescriber ID	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
VRR/RN									
scriber									
2/27/2017	6170589	1527204	Metformin Hcl 1,000 Mg	Tab Heri	23155010401	60.0	30	\$	\$ 0.00
3/2									
PINO, GIROLAMO J				FA1459191					
2/2/2017	4028740	1527858	Tramadol Hcl 50 Mg	Tab Nort	16714048101	240.0	30	\$	\$ 17.59
0/0									
GANPATRICK W				FH0182333					
3/2/2017	4028749	1528028	Clonazepam 1 Mg	Tab Nort	16714047001	60.0	30	\$	\$ 0.00
0/0									
INHART, JASON C				BR7655701					
5/2/2017	6184267	1528433	Jardiance 25 Mg	Tab Boeh	00597015330	30.0	30	\$	\$ 0.00
1/9/2									
PINO, GIROLAMO J				FA1459191					
9/20/2017	6181450	1528459	Gabapentin 300 Mg	Cap Nort	16714050402	60.0	30	\$	\$ 0.00
1/1									
GANPATRICK W				FH0182333					
10/2/2017	6185919	1529294	Hydroxyzine Hcl 50 Mg	Tab Nort	16714008310	90.0	30	\$	\$ 0.00
0/2									
BIN, CYNTHIA K				MT0682927					
10/2/2017	6187192	1529295	Atorvastatin Calcium 10 Mg	Tab Apot	60505257809	30.0	30	\$	\$ 0.00
4/1									
PINO, GIROLAMO J				FA1459191					
10/2/2017	6187191	1529296	Pioglitazone Hcl 45 Mg	Tab Macl	33342005607	30.0	30	\$	\$ 0.00
4/1									
PINO, GIROLAMO J				FA1459191					

PROTECTED HEALTH INFORMATION

ASC000070

Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	Final Patient Copay
RR/RN	Prescriber			U & C Price			
10/2017	6187195	1529293	Creon Dr 36,000 Unit	00032301628	240.0	30	\$ 0.00
4 / 1				\$			
PINO, GIROLAMO J							
11/2017	6187339	1529437	Ibuprofen 800 Mg	67877032105	90.0	30	\$ 0.00
1 / 1				\$			
GAN PATRICK W							
12/2017	6188916	1529714	Cyclobenzaprine Hcl 10 Mg	00378075110	90.0	30	\$ 0.00
0 / 0				\$			
GAN PATRICK W							
12/2017	2019355	1529721	Oxycodone Hcl 30 Mg	00406853001	120.0	30	\$ 0.00
0 / 0				\$			
JWE, VAUGHN T							
12/2017	2019354	1529720	Morphine Sulfate Er 15 Mg	60951065270	30.0	30	\$ 0.00
0 / 0				\$			
JWE, VAUGHN T							
11/2017	6184272	1529867	Prochlorperazine Maleate 10 Mg	59746011506	90.0	30	\$ 0.00
1 / 10 / 1				\$			
PINO, GIROLAMO J							
11/2017	6179901	1529866	Pantoprazole Sodium Ec 40 Mg	65862056090	60.0	30	\$ 0.00
0 / 5				\$			
PINO, GIROLAMO J							
11/2017	6179899	1530908	Montelukast Sodium 10 Mg	29300022010	30.0	30	\$ 0.00
1 / 5 / 6				\$			
PINO, GIROLAMO J							

PROTECTED HEALTH INFORMATION TASC00021

II Date	Rx#	Tx#	Drug Name	Drug NDC	DispQty	DaysSupply	U & C Price	Final Patient Copay
10/23/2017	6184270	1527590	Pioglitazone Hcl 30 Mg	33342005507	30.0	30	\$ 0.00	
10/23/2017								
10/28/2017	6181348	1532707	Lisinopril 30 Mg	00185063001	30.0	30	\$ 0.00	
10/30/2017	4028749	1533080	Clonazepam 1 Mg	16714075001	60.0	30	\$ 0.00	
10/30/2017								

Report Date: 10/30/2017

Total Patient Pay: \$68.37

Attested By:

Registered Pharmacist

PROTECTED HEALTH INFORMATION

TASC000272

7/5/18

TASC Diversion Program Payment History

POM/B	Donor Id	Redacted	808	PASCALE, MARK	POM - MARIJUANA
10002 Admission Fee				BALANCE:	\$0.00
		<u>TRANDATE</u>		<u>Receipt No.</u>	<u>AMOUNT</u>
10002		11/21/17		171121-005452548	\$75.00
10002		2/2/18		180202-005534446	\$20.00
10002		2/27/18		180227-005562396	\$30.00
10002		3/30/18		180330-005597875	\$25.00
				Total Payments:	\$150.00
10015 POM CA Fund				BALANCE:	\$0.00
		<u>TRANDATE</u>		<u>Receipt No.</u>	<u>AMOUNT</u>
10015		3/30/18		180330-005597875	\$90.00
10015		4/28/18		180428-005631405	\$200.00
10015		5/30/18		180530-005664539	\$60.00
10015		6/29/18		180629-005697835	\$300.00
				Total Payments:	\$650.00
10016 POM MCSO Fund				BALANCE:	\$0.00
10017 POM TASC Fee				BALANCE:	\$0.00
		<u>TRANDATE</u>		<u>Receipt No.</u>	<u>AMOUNT</u>
10017		3/30/18		180330-005597875	\$150.00
				Total Payments:	\$150.00
10080 SEMINAR RESCHEDULE FEE				BALANCE:	\$0.00
		<u>TRANDATE</u>		<u>Receipt No.</u>	<u>AMOUNT</u>
10080		3/30/18		180330-005597875	\$75.00
				Total Payments:	\$75.00



TASC Individual Payment History

POM/B

Donor ID: ^{Redacted} 9808

PASCALE, MARK

Transaction History as of: 8/24/2018 1:30:06PM

Date	Receipt No.	Location	Transaction	Amount
7/2/2018	180702-005699518	HQCOLLECT1	10012 GCMS Confirmation	\$15.00
6/29/2018	180629-005697835	HQCOLLECT3	10015 POM CA Fund	\$300.00
6/29/2018	180629-005697835	HQCOLLECT3	10019 Urine Analysis	\$15.00
6/21/2018	180621-005688889	HQCOLLECT3	10019 Urine Analysis	\$15.00
6/13/2018	180613-005679766	HQCOLLECT1	10019 Urine Analysis	\$15.00
6/8/2018	180608-005675149	GLEN2	10019 Urine Analysis	\$15.00
6/5/2018	180605-005670705	GLEN2	10019 Urine Analysis	\$15.00
5/30/2018	180530-005664539	GLEN1	10015 POM CA Fund	\$60.00
5/30/2018	180530-005664539	GLEN1	10019 Urine Analysis	\$15.00
5/24/2018	180524-005660711	GLEN2	10019 Urine Analysis	\$15.00
5/15/2018	180515-005649447	GLEN2	10019 Urine Analysis	\$15.00
5/10/2018	180510-005644357	GLEN2	10012 GCMS Confirmation	\$15.00
5/10/2018	180510-005644357	GLEN2	10019 Urine Analysis	\$15.00
5/1/2018	180501-005633707	GLEN2	10019 Urine Analysis	\$15.00
4/30/2018	180430-005632390	GLEN2	10019 Urine Analysis	\$15.00
4/28/2018	180428-005631405	GLEN2	10015 POM CA Fund	\$200.00
4/28/2018	180428-005631405	GLEN2	10019 Urine Analysis	\$0.00
4/19/2018	180419-005621351	GLEN1	10019 Urine Analysis	\$15.00
4/16/2018	180416-005616382	GLEN2	10012 GCMS Confirmation	\$15.00
4/13/2018	180413-005614372	GLEN2	10019 Urine Analysis	\$15.00
4/12/2018	180412-005612855	GLEN1	10019 Urine Analysis	\$15.00
4/11/2018	180411-005612045	GLEN1	10019 Urine Analysis	\$15.00
3/30/2018	180330-005597875	GLEN2	10002 Admission Fee	\$25.00
3/30/2018	180330-005597875	GLEN2	10015 POM CA Fund	\$90.00
3/30/2018	180330-005597875	GLEN2	10017 POM TASC Fee	\$150.00
3/30/2018	180330-005597875	GLEN2	10019 Urine Analysis	\$0.00
3/30/2018	180330-005597875	GLEN2	10080 SEMINAR RESCHEDULE FEE	\$75.00
3/20/2018	180320-005587194	GLEN2	10019 Urine Analysis	\$15.00
3/16/2018	180316-005582897	GLEN2	10019 Urine Analysis	\$15.00
3/15/2018	180315-005581378	GLEN2	10019 Urine Analysis	\$15.00
3/14/2018	180314-005579732	GLEN2	10019 Urine Analysis	\$15.00
3/9/2018	180309-005575348	GLEN1	10019 Urine Analysis	\$15.00
2/27/2018	180227-005562396	GLEN2	10002 Admission Fee	\$30.00
2/27/2018	180227-005562396	GLEN2	10019 Urine Analysis	\$15.00
2/13/2018	180213-005547038	GLEN2	10019 Urine Analysis	\$15.00
2/12/2018	180212-005545837	GLEN1	10012 GCMS Confirmation	\$15.00
2/8/2018	180208-005541102	GLEN1	10019 Urine Analysis	\$15.00
2/7/2018	180207-005540573	GLEN1	10019 Urine Analysis	\$15.00
2/2/2018	180202-005534446	GLEN2	10002 Admission Fee	\$20.00
2/2/2018	180202-005534446	GLEN2	10019 Urine Analysis	\$15.00
1/29/2018	180129-005528443	GLEN1	10019 Urine Analysis	\$15.00
1/23/2018	180123-005522440	GLEN2	10012 GCMS Confirmation	\$15.00
1/22/2018	180122-005521756	GLEN2	10019 Urine Analysis	\$15.00
1/11/2018	180111-005511737	GLEN2	10019 Urine Analysis	\$15.00
12/27/2017	171227-005495642	GLEN2	10019 Urine Analysis	\$14.00
12/20/2017	171220-005487754	GLEN2	10019 Urine Analysis	\$14.00
12/16/2017	171216-005483720	GLEN1	10019 Urine Analysis	\$14.00
12/8/2017	171208-005473231	GLEN1	10019 Urine Analysis	\$14.00
12/1/2017	171201-005464737	GLEN2	10019 Urine Analysis	\$14.00
11/30/2017	171130-005462412	GLEN2	10019 Urine Analysis	\$14.00
11/22/2017	171122-005455017	GLEN2	10019 Urine Analysis	\$14.00
11/21/2017	171121-005452548	DIV18	10002 Admission Fee	\$75.00
11/21/2017	171121-005452548	DIV18	10019 Urine Analysis	\$0.00
				\$1,618.00



TASC Financial Information Form-Award Letters-Waived Fees

Please write legibly

Client Name: Mark Pascale Donor ID 15 Date: 1/23/18

Employment: ☐ Full Time ☐ Part Time ☐ Unemployed ☒ Disabled

If employed, how many hours a week do you work? 0

What is your monthly income? SSI / Des Food \$750⁰⁰ / \$180⁰⁰

What is your monthly household income? \$930⁰⁰

Please list ALL monthly expenses for household (i.e. rent/mortgage):

House own	\$ 688 ⁰⁰
SRP	\$ 130 ⁰⁰
Water	\$ 45 ⁰⁰
INC.	\$ 56 ⁰⁰
Phone + Internet	\$ 120 ⁰⁰
Gas	\$ 90 ⁰⁰
	\$
	\$
	\$
	\$

TOTAL \$ 1,129⁰⁰

What do you think you are able to pay per month towards your program fees?

I don't know exact amount. But I will Be pay something

Do you have any additional income, if so what are your plans?

my son is moving in to Help me out. He will Help me with the Utilities. He works part time and goes to school

If monthly fees are reduced, how do you intend on paying off all fees by the end of the program?

I Find thing At YARD sales / And sell on eBay. Everything I made on eBay is going to go towards my Bill with you guys.

Client signature Mark Pascale

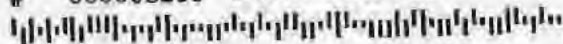
Date 1/23/18

PROTECTED HEALTH INFORMATION TASC000275

Supplemental Security Income
Notice of Change in Payment

Date: November 26, 2017
Claim Number: 1 Redacted

000003296 I-000000 1119 4 COL



3294 1 AB 0 400



914 17S1697A99467
MARK ANTHONY PASCALE
13051 N 75TH DR
PEORIA AZ 85381-4005

We plan to increase your monthly Supplemental Security Income (SSI) payment from \$735.00 to \$750.00 beginning January 2018. The amount will change because the cost of living increased during the past year. You will continue to get the new amount each month unless there is a change in the information we use to figure your payment.

The rest of this letter explains more about your SSI payments. It also tells you how to find affordable health care.

We explain how we figured the monthly payment amount on the worksheet at the end of this letter. The explanation shows how your income, other than any SSI payments, affects your SSI payment. We include explanations only for months where payment amounts change.

When You Will Receive Your Payments

Your bank or other financial institution will receive your monthly payment of \$750.00 around January 1, 2018, and on the first of each month after that.

If You Work Or Want To Return To Work

We have a program called Ticket to Work that helps people receiving disability benefits go to work. The Ticket to Work program is voluntary and won't cost you anything. If you participate in the program, employment networks or your State vocational rehabilitation agency can help you find, prepare for, and keep a job. You can find a list of service providers, benefits and work incentives counselors, and get your questions answered by contacting the Ticket to Work helpline at 1-866-968-7842 (TTY 1-866-833-2967). You also can visit www.choosework.net and select "Find Help."

See Next Page

SSA-L8151



Mortgage



43848 UNID T 0081301 100 5000
MARK A PASCALE
13051 N 75TH DR
PEORIA, AZ 85381-4005

Loan Overview (as of 01/08/2018)

Original Principal Balance	\$232,000.00
Unpaid Principal Balance	\$108,863.10
Deferred Principal Balance	\$16,800.00
Capitalized Interest Balance	\$23,117.64
Interest Rate	3.00000%
Next Interest Rate Change Date	01/2019
Escrow Balance	\$1,149.51

Your Unpaid Principal Balance is not a pay-off quote. Learn more about the payoff process by visiting chase.com/Payoff or obtain a payoff quote by calling our 24/7 automated service at 1-877-565-2334.

Past Payments Breakdown

	Paid Since Last Statement	Paid Year-to-Date
Principal	\$167.09	\$167.09
Interest	\$272.60	\$272.60
Escrow Payment (Taxes and/or Insurance)	\$248.75	\$248.75
Total	\$688.34	\$688.34

Transaction Activity Since Your Last Statement (Includes Fees/Charges)

Transaction Date	Description	Total Received	Principal	Interest	Escrow	Fees	Unapplied Funds
01/03/2018	PAYMENT	\$688.34	\$167.09	\$272.60	\$248.75		



chase.com
Chase Mobile
Make a Payment, view activity, set up alerts or paperless



Customer Service 1-800-848-9380
Includes 24/7 Automated Response
Monday - Thursday 8 a.m. - midnight (ET)
Friday 8 a.m. - 10 p.m. (ET)
Saturday 8 a.m. - 5 p.m. (ET)
Hearing Impaired Service (TTY) 1-800-582-0542

Mortgage Loan Statement

Loan Number	Redacted 3771
Statement Date	01/08/2018
Property Address	13051 N 75th Dr Peoria, AZ 85381
Total Amount	\$688.34
Explanation of Payment Amount	
Principal	\$167.51
Interest	\$272.08
Escrow Payment (Taxes and/or Insurance)	\$248.75
Monthly Payment	\$688.34





City of Peoria
Customer Service
8401 W Monroe St.
Peoria, AZ 85345

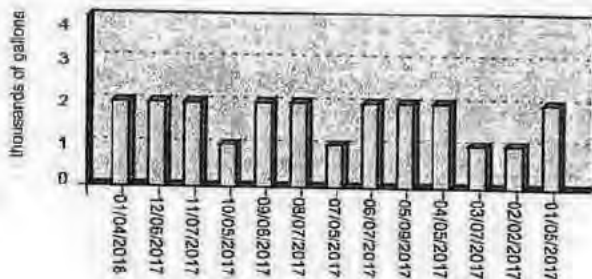
Water

*Customer Service Office: (623) 773-7160
*Office Hours: 7 am - 6 pm, Monday - Thursday

SIGN UP FOR PAPERLESS BILLING AT:
MYACCOUNT.PEORIAAZ.GOV

MARK PASCALE
13051 N 75TH DR
PEORIA, AZ 85381-4005

YOUR MONTHLY WATER USAGE



Trash collection changes during the holidays. For a schedule, visit
www.peoriaaz.gov/solidwaste.

Account Statement

ACCOUNT INFORMATION

Account Number: Redacted 15-03
Service Address: 13051 N 75TH DR
Service Period: 12/06/2017 - 01/04/2018
Bill Date: 01/11/2018

WATER METER INFORMATION (thousands of gallons)

Meter	Service Period	Previous	Current	Usage
0053789164	12/06/2017 - 01/04/2018	0025	0027	2

Last Month's Usage: 2 Last Year's Usage: 2

ACCOUNT ACTIVITY

PREVIOUS BALANCE 47.99
Late Payment Penalty 01/11/2018 2.00

Date the previous balance was due : 01/03/2018 *PAID* 49.99

This statement reflects payments posted thru Jan 10-2018

NEW CHARGES

Water Charges	18.14
Sewer Charges	13.60
EPA Charges	0.90
Residential Garbage	9.69
Residential Recycling	3.91
Storm Water Charge	1.00
Sales Tax on Water	1.74
State Water Quality Tax	0.01

New Charges Due By 02/01/2018 48.99

ACCOUNT BALANCE

TOTAL AMOUNT DUE 98.98



City of Peoria

Return bottom portion with your payment - Please fold on perforation before tearing
Make checks payable to City of Peoria

ACCOUNT INFORMATION

Account Number: Redacted 15-03
Service Address: 13051 N 75TH DR
Cycle-Route: 005-0085
Service Period: 12/06/2017 - 01/04/2018
Bill Date: 01/11/2018

DUE DATE: 02/01/2018

AMOUNT DUE

TOTAL AMOUNT DUE \$ 98.98

AMOUNT ENCLOSED

☐ Address Changed? Please check this box and fill in your new address on the back of this payment stub. Thank you!

Account Overdue. Balance forward must be paid by 02/05/2018 to avoid disconnection and/or additional fees.

MARK PASCALE
13051 N 75TH DR
PEORIA, AZ 85381-4005

PROTECTED HEALTH INFORMATION TASC000278

020118009898004899004999000000000422150031099012

Account# Redacted005

Feb 6, 2018

\$137.00

SERVICE FROM 12/14/2017 - 1/13/2018 (31 Days)

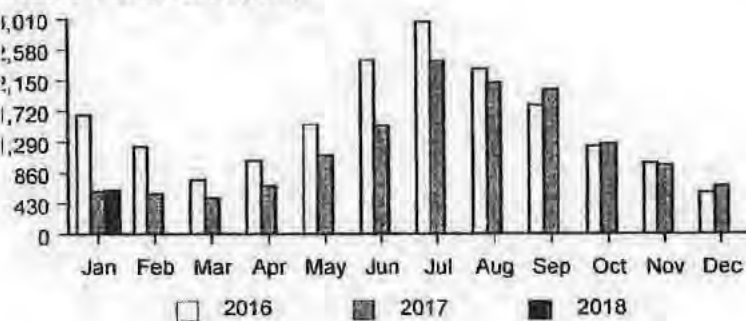
 srpnet.com 602-236-8888

MARK PASCALE

3051 N 75TH DR PEORIA

Time-of-Use Plan

ENERGY HISTORY (kWh)



COMPARISON (Daily Averages)

	Days	kWh	Cost	Temp
Jan 2018	31	21	\$1.76	58.8°
Dec 2017	31	23	\$1.96	66.9°
Jan 2017	31	20	\$1.69	57.5°

YOUR ACCOUNT SUMMARY AS OF 1/16/2018

Previous Balance	-\$75.58
1/4 Payment - Thank you	-\$137.00
Balance Before Charges	-\$212.58
Monthly Service Charge	\$20.00
On Peak Energy Charge	\$13.96
Off Peak Energy Charge	\$35.77
Economy Price Plan Discount	-\$20.00
Peoria City Tax	\$1.64
County and State Tax	\$3.13
This Month's Charges	\$54.50
NEW ACCOUNT BALANCE	-\$158.08

Your Budget Billing Summary

New Account Balance	-\$158.08
Please Pay	\$137.00
Account Balance After Payment	-\$295.08

MESSAGES FOR YOU

- ✓ You saved \$1.83 this month on the Time-of-Use Plan. Losses for the last 12 months are \$33.71. See savings tips at srpnet.com.

Meter #	Type	Current Read	Prior Read	Energy
5900656	On Pk kWh	50877	50740	137
	Off Pk kWh	36265	35762	503
	Total kWh			640

PLEASE RETURN THIS PORTION WHEN MAILING YOUR PAYMENT



R
Account# Redacted 005

Please Pay by

Feb 6, 2018

\$137.00

To donate to SHARE, please add \$1 or \$2 to your payment

Make Check Payable To

PO BOX 80062
PRESCOTT AZ 86304-8062



0077048
MARK PASCALE
13051 N 75TH DR
PEORIA AZ 85381-4005

PROTECTED HEALTH INFORMATION TASC000279

180116001

[illegible]

State Farm Payment Plan
PO Box 44110
Jacksonville FL 32231-4110

INC.

AT1 009441 0006

Redacted

PASCALE, MARK
13051 N 75TH DR
PEORIA AZ 85381-4005

Notice of Automated Payment

State Farm Payment Plan:
Accountholder Name:

Redacted
PASCALE, MARK

Total Amount:
To Be Paid On:

\$59.47
January 21, 2018

See Important Information



Agent Brandon Mueller Ins Agcy Inc
6149 N Scottsdale Rd Ste 106
Scottsdale AZ 85250-5433
Phone: 480-991-0119

Important Information

- NOTE: Recurring payment of \$59.47 will be entered JAN 21, 2018 through your financial institution.
- Future notices will only be mailed if your amount due changes. Please continue to account for this amount in your financial records each month.
- State Farm cares about the security of your information. We have recently enhanced how customers are verified. You may be asked new questions to verify your identity when you access your account online or call into our contact center.
- Changes and payments made after January 4, 2018 will be reflected on a subsequent billing notice.
- If you have any questions or would like to discuss other State Farm products, your agent is ready to assist you.

Thanks for letting us serve you!



Things change at
the **speed of life.**

Let's make sure your insurance is keeping up with all the important events in your life. Your State Farm® agent is *here to help life go right.*™

Talk to your State Farm agent today.

Page: 1 Document Name: untitled

NOTI	NOTICE	013018 13:41
CASE NAME: PASCALE, MARK	CASE NUMBER: Redacted	SUSANA W
MAILING ADDRESS:		NOTICE: F101
APT-UNIT-ETC :		
STREET ADDRESS : 13051 N 75TH DR	PEORIA	AZ 85381
TITLE : NA RENEWAL APPROVAL		

Benefit Amount

Starting 12/2017 you are eligible for \$190.00. After that you will receive \$190.00 (your monthly benefit amount that you are eligible for may be different than what is showing if there was a change in the number of people in your household, income and/or expenses for the 2nd month. We will send you a separate notice if this is the case).

You are approved through 08/2018.

SCREEN 03 OF 19

MAIL? (Y):

Phone & Internet

- My Verizon Home
- My Billing
- My Usage
- My Devices
- My Plan & Services
- My Profile

We've made your bill easier to understand. Here's a rundown of all the changes.

Get to know your new bill

Pay your bill in a tap.

My Verizon app gives you a simple breakdown of your bill and lets you pay right on your phone.

Download the My Verizon app >



Your current balance is due Feb. 17th.

\$123.59

Last payment: \$119.52 on 01/15

My Bill

January (12.26.17 - 1.25.18)

Get the details

Summary

↑ What's Changed

- \$0.00 Data, talk and text activity
- \$3.46 View Bill Details

Plan and account \$50.00

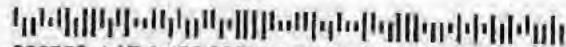
Recent bill history

Mark Pascale 480-404-3216	\$31.00			
Mark Pascale 602-619-5970	\$31.00	119.52 Nov.	119.52 Dec.	123.59 Jan.

SOCIAL SECURITY
5907 W KINGS AVE
GLENDALE AZ 85306

Social Security Administration
Supplemental Security Income
Notice of Change in Payment

Date: November 30 2014
Claim Number: Redacted DI



063758 1 AB 0.406 0237 LR TM425 1123 05

914 14SI485D99604



MARK A PASCALE

13051 N 75TH DR

PEORIA AZ 85381-4005

We are writing to tell you about changes in your Supplemental Security Income (SSI) payments. The rest of this letter will tell you more about this change. This letter also includes how to find information about affordable health care.

We explain how we figured the monthly payment amount on the worksheet at the end of this letter. The explanation shows how your income, other than any SSI payments, affects your SSI payment. We include explanations only for months where payment amounts change.

Information About Your SSI Payments

- The amount due you beginning January 2015 will be \$733.00.
- The amount due you is being raised because the law provides for an increase in Supplemental Security Income payments in January 2015 if there was an increase in the cost-of-living during the past year.

If You Work or Want to Return to Work

There are special rules that help people with disabilities return to work without losing their SSI benefits and Medicaid. You must follow these rules and report your earnings, or you may have to repay a large part of your benefits. When you report your earnings, we will give you a receipt to verify your report. Keep this receipt with your other important papers from us.

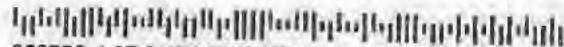


See Next Page


SOCIAL SECURITY
5907 W KINGS AVE
GLENDALE AZ 85306

Social Security Administration
Supplemental Security Income
Notice of Change in Payment

Date: November 30, 2014
Claim Number: Redacted



063758 1 AB 0.406 0237 LR TM425 1123 05
914 14S1485D99604

 MARK A PASCALE
13051 N 75TH DR
PEORIA AZ 85381-4005


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See Next Page

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INFO * MORE PAGES EXIST

SBH

FS BENEFIT HISTORY

110817 13:30

ASE NAME: PASCALE, MARK

CASE NUMBER: Redacted

TARRY T

---- ALLOWABLE DEDUCTIONS ----																
MON	HOUSEHOLD	GROSS	STD	EXCESS	DEP	CHLD	SHELT	BEN	NET	ISS						
	SIZ	TYP	SR	CTB	INC	DED	%DED	MED	CARE	SUPP	COST	TYPE	AMT	RCP	BEN	IND
1217	01	SBC			735	160	0	0	0	0	571	RE	190	0	190	MO
1117	01	SBC			735	160	0	0	0	0	571	RE	190	0	190	PM
1017	01	SBC			735	160	0	0	0	0	571	RE	190	0	190	PM
0917	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0817	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0717	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0617	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0517	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0417	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0317	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0217	01	SPE			735	157	0	0	0	0	561	RE	188	0	188	PM
0117	01	SPE			733	157	0	0	0	0	562	RE	189	0	189	PM
1216	01	SPE			733	157	0	0	0	0	562	RE	189	0	189	PM
1116	01	SPE			733	157	0	0	0	0	562	RE	189	0	189	PM

* = DEAUTHORIZED MONTH

NEXT-->



January 26, 2018

Mark Pascale
13051 N. 75TH DR
Peoria AZ 85381
RE 1st Program Violation Notice

Dear Mark:

Our records indicate that your program requirements are not being met as follows:

 X Urine test schedule not met – You are required to call the IVR Mon.- Sun. Your last test was submitted on **1/22/18**, you missed tests on **1/25/18**.

 Urine test(s) **Diluted** on . As a reminder, please test in the morning and avoid drinking more than 32 ounces of fluid within one hour of urine testing.

 Urine test(s) positive for **OPIATES** on **1/11/18**.

 Failure to attend counseling/seminar –

 Failure to make payments as agreed – The last payment made on your account was \$ on . If you are experiencing a hardship, you must provide two current pay stubs and complete a financial statement for consideration.

Payments of \$ are due by the 3rd Friday each month

 Other – .

Please contact me **NO LATER THAN 2/6/18** to discuss these matters. Failure to do so may result in your case being returned to the County Attorney's Office for prosecution.

Viviana Garcia
POM Case Manager
602-254-7328 Ext. 220-Phone
623-842-1233-Fax

Comprehensive Solutions. Proven Results.

TASC SOLUTIONS.ORG

Corporate Office, 4016 N. Black Canyon Hwy, Phoenix, AZ 85017

(602) 254-7328

PROTECTED HEALTH INFORMATION

TASC000286



January 12, 2018

VOID

Mark Pascale
13051 N. 75TH DR
Peoria AZ 85381
RE 1st Program Violation Notice

Dear Mark:

Our records indicate that your program requirements are not being met as follows:

_____ Urine test schedule not met – You are required to call the IVR Mon.- Sun. Your last test was submitted on _____, you missed tests on _____.

_____ Urine test(s) **Diluted** on _____. As a reminder, please test in the morning and avoid drinking more than 32 ounces of fluid within one hour of urine testing.

 X Urine test(s) positive for **OPIATES** on **1/11/18**.

_____ Failure to attend counseling/seminar –

_____ Failure to make payments as agreed – The last payment made on your account was \$ _____ on _____. If you are experiencing a hardship, you must provide two current pay stubs and complete a financial statement for consideration.

Payments of \$ _____ are due by the 3rd Friday each month

_____ Other – _____.

Please contact me **NO LATER THAN 1/24/18** to discuss these matters. Failure to do so may result in your case being returned to the County Attorney's Office for prosecution.

A handwritten signature in black ink, appearing to read "Viviana Garcia", is written over a horizontal line.

Viviana Garcia
POM Case Manager
602-254-7328 Ext. 220-Phone
623-842-1233-Fax

Comprehensive Solutions. Proven Results.



Disclosure with Patient's Consent as per Title 42,
Chapter 1, Part 2, Federal Register,
Tuesday, July 1, 1975, Volume 40 #127, Part IV

Name of Client: MARK PASCALE

Redacted

Date of Birth: 5 SS #: Redacted 3283

Disclosure of Information Requested of TASC

Disclosure made with: E-Mail Address: MARK2496@COX.NET

For the purpose of possible entry to the TASC Program.

Extent or nature of information to be disclosed: Urinalysis results, drug history information, progress in the TASC program.

Other Information: Communication via e-mail

Duration of Content: Until termination of TASC Program

It is herein understood that this consent for disclosure is subject to revocation by the client at any time except to the extent that action has already been taken on that consent. Without express revocation, consent will expire when the client terminates continuous treatment in the TASC program. However, for persons on probation or parole, if consent is given for disclosure to the criminal justice system, this consent may not be revoked.

Date Signed: 11/21/17 Witness: W.H.C.

Signature of Client: [Signature]
 OR

Authorized Person as per § 2.15 or § 2.16: _____

Guardian

Per Federal Regulations: No disclosure can be made on a form which does not conform to Federal Regulations and contain the above data. Further, if the document appears false, information will not be disclosed until the matter is cleared up.

IMPORTANT!!!

This information has been disclosed to you from records whose confidentiality is protected by Federal Law. Federal Regulations (42 CFR, Part 2) prohibit you from making any further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for release of medical or other information is NOT sufficient consent for this purpose.



**DISCLOSURE WITH PATIENT'S CONSENT AS PER TITLE 42, CHAPTER 1, PART 2
FEDERAL REGISTER, TUESDAY, JULY 1, 1975 VOLUME 40 #127 PART IV**

Name of Client MARK PASCALE
Redacted
Date of Birth 1/58
Social Security Number Redacted-3283

Disclosure of information requested of TASC

Disclosure made to: County Attorney, Court, Judge, Defense Attorney, Probation, TASC

For the purpose of possible entry to the TASC Program.

Extent or nature of information to be disclosed: urinalysis results, drug history information, progress in the TASC Program.

Other information _____

Duration of Consent: Until termination of the TASC Program.

It is herein understood that this consent for disclosure is subject to revocation by the client at any time except to the extent that action has already been taken on that consent. Without express revocation, consent will expire when the client terminates continuous treatment in the TASC Program. However, for persons on probation or parole, if consent is given for disclosure to the criminal justice system, this consent may not be revoked.

Date signed 11/21/17 Witness WRC

Signature of Client [Signature]
or
Authorized person as per § 2.15 or § 2.16 _____

Per Federal Regulations: No disclosure can be made on a form which does not conform to Federal Regulations and contain the above data. Further, if the document appears false, information will not be disclosed until the matter is cleared up. **IMPORTANT!** This information has been disclosed to you from records whose confidentiality is protected by Federal Law. Federal Regulations (42 CFR, Part 2) prohibit you from making any further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for release of medical or other information is NOT sufficient consent for this purpose.



MARICOPA COUNTY ATTORNEY / TASC ADULT DEFERRED PROSECUTION PROGRAM
POSSESSION OF MARIJUANA

CLIENT CONTRACT

- MP 1. I will submit to urine testing as scheduled (including as direct by my case manager).
- MP 2. I understand I must submit a minimum of 90 consecutive days of clean urine testing with no missed, positive, or diluted testing before I am eligible for early release.
- MP 3. I will pay the required fee for each urine test and show picture I.D. prior to testing.
- MP 4. I will verify all prescribed medications by bringing in my prescription(s) before testing.
- MP 5. I understand that I may be subjected to additional urinalysis testing which is an additional cost to me as specified in the explanation of fees due to including, but not limited to, positive urinalysis due to prescription medications or urinalysis testing non-compliance.
- MP 6. Alcohol use is prohibited while participating in the program.
 Including over the counter medications with Alcohol (IE: Nyquil)
- MP 7. I understand that at NO time am I allowed to use any form of synthetic cannabinoids or Salvia while participating in the program.
- MP 8. I agree to attend the assigned Drug Education Seminar. Failure to attend the seminar without 48 hours' notice to my case manager will result in a \$75 charge for reassignment.
- MP 9. I will adhere to the strict confidentiality of all clients.
- MP 10. I agree to report ANY changes in address/telephone number(s), employment status or living conditions. (I must inform my case manager BEFORE I move).
- MP 11. I am not permitted to leave the state/relocate out of state without special permission from TASC. I will inform my case manager at least a week in advance if leaving Maricopa County for More than one day.
- MP 12. I will report any police contacts or arrests to my case manager. If felony charges are filed, I understand that I may be unsuccessfully terminated from the Diversion Program.
- MP 13. I will pay the program costs of ☐ \$850.00 ☒ \$800.00 and make a minimum payment of ☐ \$170.00 ☒ \$160.00 per month as stated in the Explanation of Fees. Failure to make payments each month as agreed will result in my case being returned for prosecution.
- MP 14. If my fees are reduced and I submit a positive/diluted/altered urine test, full fees may be reinstated as outlined in the Explanation of Fees until completion of the program.
- MP 15. Continued positive/diluted/altered urine tests will result in my option to either participate in weekly counseling and urine tests or to have my case returned to the County Attorney's Office for prosecution.
- MP 16. If placed in counseling: I will attend the assigned sessions weekly, submit a urine sample prior to each group, and pay additional fees as specified in the Explanation of Fees.



MARICOPA COUNTY ATTORNEY / TASC ADULT DEFERRED PROSECUTION PROGRAM
POSSESSION OF MARIJUANA

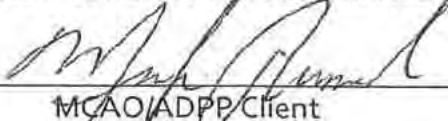
CLIENT CONTRACT CONT.

MP 17. I understand that failure to test as scheduled, continued positive/diluted/alterd tests, missed seminar/counseling, and/or failure to make payments as agreed may result in unsuccessful termination from the program.

MP 18. Unless disability status applies, I must be employed while participating in the program.

The program rules and regulations have been explained to me. I understand these requirements and agree to comply with them. A violation of any of the above provisions can result in program termination. Upon termination a written report of the violation(s) will be submitted to the court.

I HEREBY CONSENT TO PARTICIPATE IN THE TASC TREATMENT PROGRAM.


MCAO/ADPP Client


MCAO/ADPP Case Manager

11/21/17
Date

11/21/17
Date



MARICOPA COUNTY ATTORNEY / TASC ADULT DEFERRED PROSECUTION PROGRAM
POSSESSION OF MARIJUANA

PROGRAM REQUIREMENTS

1. Urine testing:

In order to test you will need to bring: \$14.00 Money Order or Debit Card, Picture ID, and your Donor ID number.

- You are to begin calling the IVR System tomorrow, 1-480-470-TASC (8272).
- Enter your PIN I.D. 3615 and Date of Birth to indicate if you are required to test.

2. Drug Education Seminar:

Date: 1/11/18
 Time: 5:45
 Location: HQ

If your color is called on the date of your scheduled seminar, you must test prior to attending your seminar.

3. Program fees:

- 6 Months: ☐ \$850.00 payable in monthly installments of \$170/mo.
☒ \$800.00 payable in monthly installments of \$160/mo.

If approved, balance paid in full \$850.00 (if booked)
 If approved, balance paid in full \$800.00 (if not booked)

Your first payment is due 12/15/17 in **MONEY ORDER or DEBIT CARD.**

Payments are due the 3rd FRIDAY of each month and you are required to make a payment each month until the balance is paid in full. Payments can be made at any of our office locations, M - F, during regular business hours. **Always keep your receipts.**

Clients MUST be signed in 30 minutes prior to close of business or they will NOT be allowed to test.

[Signature]
 MCA/ADPP Client

11/21/17
 Date

[Signature]
 MCA/ADPP Case Manager

11/21/17
 Date



MARICOPA COUNTY ATTORNEY / TASC ADULT DEFERRED PROSECUTION PROGRAM
POSSESSION OF MARIJUANA

EXPLANATION OF FEES

I, Mark Pascual, do hereby agree to pay a service fee to TASC as follows:
 Print Name

NP I understand that the Application Fee of **\$150.00** must be paid prior to beginning the program and is NOT refundable.

NP I understand that the fees for participating in the Maricopa County Attorney/Adult Deferred Prosecution Program are:

TASC Application Fee	\$150.00	\$150.00
TASC Program Fee	\$150.00	\$150.00
County Attorney Assessment	\$650.00	\$650.00
County Jail Booking Fee (if applicable)	\$50.00	-----
Total Costs (urinalysis fees not included)	\$1,000.00	\$950.00

NP I understand that the fees and fines are nonrefundable and can be paid in full at any time

NP OR can be paid in monthly payments.

NP I understand that my monthly payment will be:

☒ 6 Months: ☐ \$170.00/mo (if booked) ☒ \$160.00/mo (if not booked)

*****IF APPROVED....*****

Clients that have completed ALL program requirements may be eligible for early termination.

TASC will contact clients if they are eligible for early termination

(PAYMENTS MUST BE MADE IN MONEY ORDER OR DEBIT CARD ONLY!)

NP I understand that I will pay **\$14.00** for each urine test.

NP I understand that failure to make monthly payments as agreed may result in mandatory payments each time I test. (Payments will be added to current testing costs. Failure to make payment will result in program violation).

NP I understand that I can be charged additional fees as follows:

- unexcused absence from the Drug Education Seminar \$75.00
- counseling (if required, due to continued positive urine tests) \$25.00 per group/\$100.00 assessment
- additional testing (prescription, program non-compliance and/or legal charge) Market Price/per test

Service fees (urinalysis, program costs, etc.) are subject to change. Notice will be provided prior to any fee changes.

[Signature]
 MCA/ADPP Client
[Signature]
 MCA/ADPP Case Manager

11/24/17
 Date
11/21/17
 Date

IN THE SUPERIOR COURT OF MARICOPA COUNTY, ARIZONA

ARIZONA DRUG ENFORCEMENT FUND,
Plaintiff

v.

Mark Pascale

Defendant

NO. _____
CONSENT JUDGMENT

Defendant, Mark Pascale, hereby consents to the entry of judgment against
Client Name
him/her in the amount of \$650.00. This consent is freely and voluntarily given. The amount owed is a just debt based
on consideration given to the defendant by the Maricopa County Attorney's Office.

DONE this 21 day of NOV, 20 17.

[Signature]
Defendant Signature



MARICOPA COUNTY ATTORNEY / TASC ADULT DEFERRED PROSECUTION PROGRAM
POSSESSION OF MARIJUANA

ARIZONA DRUG ENFORCEMENT ACCOUNT AGREEMENT

It is agreed between the Maricopa County Attorney's Office and Mark Pascale
Client Name
that monies in the amount of \$650.00 will be paid to the Arizona Drug Enforcement Account by the
MCA/ADPP client as a condition of the client's participation in the Maricopa County Attorney/TASC
Drug Diversion Program. Payment is to be made in full prior to client's completion of the Diversion
program. Failure to make payment as agreed (unless modified in writing) will result in the client
being unsuccessfully terminated from the diversion program and criminal charges will be filed by the
Maricopa County Attorney's Office.

[Signature]
MCA/ADPP Client

[Signature]
MCA/ADPP Case Manager

Nov 21 / 17

Date

11/21/17

Date

pjm

TASC ADULT DEFERRED PROSECUTION PROGRAM

ALL INFORMATION IS KEPT CONFIDENTIAL PER TITLE 42, CHAPTER 1, PART 2,
FEDERAL REGISTER, TUESDAY JULY 1, 1975, VOLUME 40 #127, PART IV

DIVERSION/POM <input type="checkbox"/> Re-Entry <input type="checkbox"/> 2nd Offer <input type="checkbox"/> OOS <input type="checkbox"/> OOA			
Appointment Date: 11-21-17 <input type="checkbox"/> Monday <input type="checkbox"/> Tuesday <input type="checkbox"/> Wednesday <input type="checkbox"/> Other:			
Case Manager: Viviana	Donor ID: Redacted 1808	PIN# 3615	
Def Attorney: Marc Bivens		<input type="checkbox"/> PD <input type="checkbox"/> LD <input type="checkbox"/> Priv (Phone):	
PLEASE PRINT CLEARLY			
Today's Date: 10-30-17	SSN: Redacted -3283	Amount Paying Today: \$ 75-	
Name: Mark Anthony Pascale	Date of Birth: Redacted-50	Age: 59	
Current address: 13051 N. 75th Dr		City: Peoria	
State: AZ	ZIP Code: 85381	Cell/HM #: 602-619-5970	Contact Method: <input type="checkbox"/> Call <input checked="" type="checkbox"/> Text <input type="checkbox"/> Email
Email Address: mark2496@cox.net		Other Names Used:	
Preferred Testing Location: <input checked="" type="checkbox"/> GLENDALE <input type="checkbox"/> MESA <input type="checkbox"/> PHOENIX <input type="checkbox"/> NORTH PHOENIX <input type="checkbox"/> OTHER			
Are you bilingual: <input type="checkbox"/> YES <input type="checkbox"/> NO If yes, besides English, what other language do you speak?			
EMERGENCY CONTACT			
Name: Sandy pascale		Relationship: EX-wife	
Address:		City:	State: ZIP:
Daytime Phone: 602-518-8271		Other Phone:	
DEMOGRAPHICS			
MALE <input checked="" type="checkbox"/> FEMALE <input type="checkbox"/>		Marital Status: <input type="checkbox"/> Single <input type="checkbox"/> Separated (P) <input checked="" type="checkbox"/> Divorced <input type="checkbox"/> Married - Spouse Name:	
Ethnicity (Check One): <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Asian <input type="checkbox"/> Mixed/Other (Specify):			
CRIMINAL HISTORY			
Charge(s) that brought you to TASC today (check all that apply)			
<input checked="" type="checkbox"/> Possession of Marijuana <input type="checkbox"/> Possession of Narcotic Drugs			
<input type="checkbox"/> Possession of Dangerous Drugs <input type="checkbox"/> Obtaining a Prescription Drug by Fraud			
<input type="checkbox"/> Attempted Possession of:		<input type="checkbox"/> Other:	
Were you booked - photographed and/or fingerprinted for this charge? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
Not including the above charges, have you ever been arrested before? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
If yes: Arrested for:		Year:	State:
What was the outcome of this incident?		<input type="checkbox"/> Fine <input type="checkbox"/> Probation-Felony <input type="checkbox"/> Jail/Prison <input type="checkbox"/> Other Diversion Program	
Have you ever been to TASC Before: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
If yes, explain:			
EMPLOYMENT			
Employment Status: <input type="checkbox"/> Full Time <input type="checkbox"/> Part Time <input type="checkbox"/> Disabled <input type="checkbox"/> Unemployed From: Disabled		Employer: Employer's Phone:	
List the amount you receive each month from:	\$ 9 TANF	\$ 190 Food Stamps	\$ 9 Disability
	\$ Section 8 Housing	\$ Unemployment	\$ Child Support
	\$ 730 Social Security (SSI/SSDI)	AHCCCS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Monthly Gross Income: \$			
TREATMENT COUNSELING / MEDICAL HISTORY (not including 12 Step support groups)			
Have you ever received alcohol or drug counseling? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		When & Where:	
Have you or are you now seeing a counselor or therapist? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		Name:	
Primary Reason:			

PROTECTED HEALTH INFORMATION

Continued on other side

TASC000296

Ver. 2.4 4/25/16

Are there any health problems TASC should be aware of? (For example: Diabetes, Epilepsy, history of seizures, heart disease, etc.)

Back pain & neck pain

Please list any medications you are currently being prescribed (Over-the-counter medications not needed)

Medication	Strength	Prescribing Doctor
Oxycodone	30mg	Dr. Hogan
Morphine	15mg	
Clonopen	1mg	

Do you have a Medical Marijuana card? ☐ Yes (☐ Arizona ☐ Other _____) ☐ No ☐ Applied

DRUG HISTORY

Check those drugs that you have ever tried, experimented, or used:

☐ Alcohol ☐ Amphetamine (Crystal, Ice) ☐ Cocaine/Crack ☐ Marijuana (T) ☐ Heroin (O) ☐ PCP ☒ Denies

Date Last Drug Use: ☐ THC ☐ Coc ☐ Meth ☐ Opiate ☐ Other:

☐ Prescription (specify) ☐ Other (specify)

Which of the above do you use most often?

Your age when first used drugs:

Have you ever injected drugs? ☐ YES ☐ NO Last time you injected and what drug?

DO NOT WRITE BELOW THIS LINE – FOR TASC USE ONLY

Current Offense: ☐ Pre-File ☒ Post-File ☒ EDC ☐ SEF ☐ RCC ☐ Trial Group

Pre-File: CA#

DR#

Post-File: CR# 2017-141973-001

DR# Redacted 8796

2nd Charge CA#

DR#

2nd Charge CR#

DR#

☒ POM

☐ POND ☐ APOND ☐ Crack ☐ Cocaine ☐ Heroin/Other ☐ POM

☐ Podd ☐ APODD ☐ Meth ☐ LSD ☐ Other ☐ POM

☐ AONDF ☐ AODDF ☐ ODDF ☐ ONDF ☐ Rx

FEES: ☐ Full (F) ☐ Sliding (S) ☐ Co-Pay (C)

Intake Fee	TASC Fee	CA Fund	Booking Fee	UA Fees
\$150	\$150	\$650	\$50/\$0	\$14 POM
\$150	\$1285	\$750	\$50/\$0	\$14 DIV
\$175	\$1285	\$1500	\$50/\$0	DIVRX \$19 \$24 \$29

Verification: ☐ AHCCCS Card ☐ SSI/SSDI Award Letter ☐ Other

Amt to Pay Now: \$

Amt Paid: \$ 75

Employee Initials: AC

Office: Glendale

Contact Case Manager:

Seminar Date: 1/11/18

1st Payment Due: 12/15/17

Comments:

ct Bringing in \$75.00



Marc

MARICOPA COUNTY ATTORNEY / TASC DRUG DIVERSION PROGRAM

STATEMENT OF FACTS

DATE: 10-30-17APPLICANT'S NAME: Mark Anthony pascale DATE OF BIRTH: Redacted - 58APPLICANT'S ADDRESS: 13051 N - 75th N Peoria AZ 85381DR #: Redacted 8796 SUBMITTAL # CR 2017-141973-001

You have the right to remain silent. Anything you say can be used against you in a court of law. You have the right to the presence of an attorney to assist you prior to questioning and to be with you during questioning if you so desire. If you cannot afford an attorney, you have the right to have an attorney appointed for you prior to questioning. Do you understand these rights: MP yes

- 1) Offense under investigation? POSSESSION OF MARIJUANA
- 2) Date of offense? 5-1-17
- 3) Location and County Peoria ARIZONA, MARICOPA COUNTY
- 4) What substance did you possess or use? MARIJUANA
- 5) Did you knowingly possess or use the substance? yes
- 6) Was it a usable amount? yes
- 7) Did you have a valid doctor's prescription for the substance? NO
- 8) What are the facts of the offense? Found in car in my possession
marijuana

I HAVE MADE THIS STATEMENT WITHOUT COERCION AND OF MY OWN FREE WILL I FULLY UNDERSTAND THAT WHAT I HAVE WRITTEN HERE MAY BE USED AGAINST ME IN A COURT OF LAW SHOULD I FAIL TO SATISFACTORILY COMPLETE THE TASC PROGRAM. Do you have a full understanding of this statement? mp yes

Applicant's Signature: [Signature] Date: 10/30/17Attorney's Signature: [Signature] Date: 10/30/17

I HAVE WAIVED MY RIGHT TO AN ATTORNEY AND HAVE ANSWERED ALL QUESTIONS:

Applicant's Signature

Date

TASC Signature: Stella Garcia Date: 10-30-17

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

BIVENS/OUT

STATE OF ARIZONA,

Case No. 2017-141973-001

WAIVER OF PRELIMINARY HEARING AND
CONSENT TO PARTICIPATE IN DEFERRED
PROSECUTION PROGRAM

vs.
MARK PASCALE
Defendant

Instructions: You are entitled to a preliminary hearing on the charge(s) against you unless charged by grand jury indictment. The purpose of this form is to notify you of your rights and of the ways in which the hearing could benefit you, and to allow you to give up your rights if you choose. Read the entire form before signing it.

RIGHT TO A PRELIMINARY HEARING

I understand that I am charged with the crime(s) of: POSS. OF MARIJUANA PG 5/1/17

which is a felony under the law of Arizona and that if I am found guilty I can be given severe punishment, including imprisonment in the Arizona State Prison, in the Maricopa County Jail, by fine or other penalty.

I understand that under the Arizona constitution I have a right to a Preliminary Hearing at which a magistrate, without making any determination of my guilt or innocence, will decide whether there is sufficient evidence against me to establish probable cause to try me on these charges. I understand that I have a right to a lawyer at the Preliminary Hearing, and that if I am unable to obtain the services of a lawyer without incurring substantial hardship to myself or to my family, one will be furnished for me free of charge.

I understand that the prosecutor would be required to present witnesses and evidence against me at such a hearing to demonstrate that there is probable cause to try me on the charges and that I would have the right to cross-examine such witnesses and to present evidence of my own innocence. I understand that if the prosecutor failed to show probable cause to try me, the charges against me would be dismissed.

I understand that giving up my right to a preliminary hearing gives the state the right to try me for the offenses charged without any determination of probable cause by a magistrate.

CONSENT TO PARTICIPATE IN DEFERRED PROSECUTION PROGRAM

I agree to participate in the deferred prosecution program, and I give my consent to the Maricopa County Attorney's Office to apply to the Court for suspension of prosecution of the matter. I understand that my participation in the program is contingent upon my acceptance. If accepted, I will adhere to the regulations of the program and the directives of my case manager. By agreeing to participate in the deferred prosecution program, I acknowledge that:

1. I must report to TASC at the location and on the date assigned. Prior to signing this Consent, I have received my assigned location and date to report in writing from the TASC representative.
2. This consent will, by necessity, cause a delay in the prosecution of this case, and I waive my right to a speedy trial as guaranteed by the Constitution and Rule 8 of the Arizona Rules of Criminal Procedure. Prosecution will be suspended for up to two years.
3. The Court is releasing me in this case on my own recognizance-my promise to appear at all future court dates. If the prosecutor seeks to resume prosecution against me, I will be notified of my next court date by mail. The Court is ordering that I notify TASC of my current address and that I promptly notify TASC of any changes to my address at all times during the next two years, unless earlier than that date the Court dismisses the charges against me in this case. The Court will issue a warrant for my arrest if I fail to appear at future court dates.

CERTIFICATION AND WAIVER

After reading and understanding all of the above, I hereby give up my right to a Preliminary Hearing in this case and consent to participation in the deferred prosecution program.

DO NOT SIGN THIS FORM IF YOU WANT A PRELIMINARY HEARING

10/30/17
Date

[Signature]
Defendant

I have explained the significance of the preliminary hearing to the defendant, the Consent to Participate in Deferred Prosecution Program, and consent to waiver of a preliminary hearing in this case.

10/30/17
Date

[Signature]
Defense Counsel

032858
Bar Number

PROTECTED HEALTH INFORMATION TASC000299

I consent to a waiver of a preliminary hearing in this case.

12-2581

WILLIAM G MONTGOMERY
MARICOPA COUNTY ATTORNEY
Bar ID #: 021246
301 West Jefferson, 8th Floor
Phoenix, AZ 85003
Telephone: (602) 506-1260
mcaoptd@mcao.maricopa.gov
MCAO Firm #: 00032000
Attorney for Plaintiff

DR 201700028796 - Peoria Police Department
0131671718

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

THE STATE OF ARIZONA,

Plaintiff,

vs.

MARK PASCALE,
aka MARK ANTHONY PASCALE

Defendant.

CR2017-141973-001

INFORMATION

**COUNT 1: POSSESSION OR USE OF
MARIJUANA, A CLASS 6 FELONY (MARK
PASCALE)**


THE MARICOPA COUNTY ATTORNEY accuses MARK PASCALE, on this date,
charging that in Maricopa County, Arizona:

COUNT 1:

MARK PASCALE, on or about May 1, 2017, knowingly did possess or use an amount of
marijuana having a weight of less than two pounds, in violation of A.R.S. §§ 13-3401, 13-3405,
13-3418, 13-701, 13-702, and 13-801.

Dated October 30, 2017.

WILLIAM G MONTGOMERY
MARICOPA COUNTY ATTORNEY

BY: 
/s/ Azadeh Hamilton

PROTECTED HEALTH INFORMATION

TASC000300

Deputy County Attorney

ah

EDC PLEA OFFERDefendant: Mark PascaleDate: October 10, 2017 October 30, 2017CR#: CR2017-141973-001PRIORS: 0/_____STRIKES: 1

PROB/PAROLE:

OFFER: POM; C1M ☐ A ☒ F ☐ H ☐ B ☐ H4STIPULATIONS: ☒ PROB ☐ SUPERV PROB ☐ N/A ☐ DOCJAIL _____ months ☐ FLAT ☐ NO CREDIT ☐ RELEASE W/ALPHA
☐ NO WORK FURLOUGH☐ This offer is contingent on entry/acceptance of

**Unless otherwise stated, the State shall oppose work release.

**Unless otherwise indicated above, work furlough or 2-for-1 credit is not prohibited.

**Unless otherwise indicated, all F6 open offers include "earned misdemeanor" language.

FINE + 83 % surcharge ☒ \$750 ☐ \$1000 ☐ \$1200 ☐ \$2000TASC ELIGIBLE: ☒ YES ☐ NO

*THE OFFER IS WITHDRAWN IF THE PRELIMINARY HEARING IS SET OR WAIVED. THE OFFER MAY BE CHANGED OR REVOKED AT ANY TIME BEFORE THE COURT ACCEPTS THE PLEA.

*NOTE: COUNTY ATTORNEY POLICY DICTATES THAT IF THE DEFENDANT REJECTS THIS OFFER, ANY SUBSEQUENT OFFER TENDERED WILL BE SUBSTANTIALLY HARSHER.

If you are requesting the plea, please fill out the bottom portion of this form and place the entire form in the plea request slot. Pleas will be written in the order in which they have been received unless an interpreter or in-custody matter. Completed pleas will be placed in the completed plea slot when they are finished.

DATE/TIME REQUESTED: _____

INTERPRETER MATTER: ☐ YES ☐ NO IN CUSTODY: ☐ YES ☐ NOSpecial requests (i.e. solicitation, or SSI language – please include SSI document):
_____Defense attorney: _____
(please write legibly)

EXHIBIT 21

Release Questionnaire

IN THE SUPERIOR COURT
STATE OF ARIZONA, COUNTY OF MARICOPA

RELEASE QUESTIONNAIRE

Information to be supplied by a prosecutor or law enforcement officer

STATE OF ARIZONA vs. DESHAWN LAMONTE BRIGGS DOB [REDACTED] CASE / BK. NO. 2015-44228

A. GENERAL INFORMATION

- Charge and class:
POSSESSION OF MARIJUANA ARS 13-3405A1 (C6F)
- Offense Location: [REDACTED]
AVONDALE, AZ 85323
Date: 12-19-2015 Time: 0127
- Arrest Location: [REDACTED]
AVONDALE, AZ 85323
Date: 12-19-2015 Time: 0148

B. CIRCUMSTANCES OF THE OFFENSE

- Was a firearm or other weapon used?
☐ Yes ☒ No
Type of weapon: _____
Was anyone injured by the defendant?
☐ Yes ☒ No
Was medical attention necessary?
☐ Yes ☒ No
Nature of injuries: ☐ _____
- Was anyone threatened by the defendant?
☐ Yes ☒ No
Nature & extent of threats: _____
- If property offense, value of property taken or damaged:

Was property recovered?
☐ Yes ☒ No

C. CIRCUMSTANCES OF THE ARREST

- Did the defendant attempt to:
Avoid arrest? ☐ Yes ☒ No
Resist arrest? ☐ Yes ☒ No
Explain: _____
- Was the defendant armed when arrested?
☐ Yes ☒ No
Type of weapon: _____
- Was evidence of the offense found in the defendant's possession?
☒ Yes ☐ No
Explain: MARIJUANA FOUND IN VEHICLE IN WHICH HE ADMITTED OWNERSHIP OF.
- Was the defendant under the influence of alcohol or drugs at the time of the offense?
☒ Yes ☐ No ☐ Unk

CRIMES OF VIOLENCE

- Relationship of defendant to victim:
Do the victim and defendant reside together?
☐ Yes ☐ No
- How was the situation brought to the attention of the police?
☐ Victim
☐ Third party
☐ Officer observed
- Have there been any previous incidents involving these same parties?
☐ Yes ☐ No
Explain: _____
- Is defendant currently the subject of:
☐ An order of protection
☐ Injunction against harassment
☐ Any other court order
Explain: _____

D. OTHER INFORMATION

- Is the defendant presently on probation, parole or any other form of release involving other charges or convictions?
☐ Yes ☒ No
Explain: _____
- List any prior arrests, convictions, and / or F.T.A.'s:
NONE
- Is there any indication the defendant is:
☐ An alcoholic? ☐ An addict?
☐ Mentally disturbed? ☐ Physically ill?
☐ Any other court order?
- Is the defendant currently employed?
☒ Yes ☐ No
With whom WAL-MART
How long 1 YEAR
Nature of employment _____
- Where does the defendant currently reside?
[REDACTED]
With whom _____
How long 1 YEAR
- What facts indicate the defendant will flee if released
Explain: NONE
- What facts does the State have to oppose an unsecured release? Explain:
NONE

E. DRUG OFFENSES

1. If the defendant is considered a major drug dealer, please state the supporting facts:
NO

2. What quantities and types of illegal drugs are directly involved in this offense?
APPROX 4.5 GRAMS OF MARIJUANA

Approximate monetary value: \$40.00
3. Was any money seized?
☐ Yes ☒ No
Amount: \$ _____
4. Were any automatic weapons in the possession of the defendant at the time of the arrest?
☐ Yes ☒ No
Quantity and type: _____

SECTION III: Probable Cause Statement

1. Please summarize and include the information which establishes probable cause for the arrest:

On 12-19-2015 at approximately 0148 hours, I placed Deshawn Lamonte Briggs under arrest for Possession of Marijuana (ARS 13-3405A1) after marijuana was discovered in a vehicle (beside Deshawn's seat), which Deshawn admitted ownership of, during a traffic stop investigation at approximately [REDACTED] Avondale, AZ 85323.

On 12-19-2015 at approximately 0127 hours, I was traveling northbound at approximately [REDACTED] when I observed a gray Dodge Magnum (AZ [REDACTED]) traveling northbound ahead of me in the #3 lane. I observed the vehicle was failing to maintain its lane as it was swerving into the bike lane and into the #2 lane several times. I conducted a traffic stop on the vehicle and approached the passenger side.

The driver rolled down the front driver side and front passenger side windows. As I leaned next to the front passenger side window to contact the occupants inside the vehicle, I immediately smelled a strong odor of burnt marijuana in the vehicle, which I recognized by my training and experience.

I had the subjects exit the vehicle. I advised them of the odor of marijuana in the vehicle and they all denied knowledge of any marijuana in the vehicle or possessing it on their persons. None of the subjects had medical marijuana cards. All of the subjects were searched with negative results.

K-9 Officer M. Miller #1115 arrived on scene and conducted a K-9 sniff of the vehicle. The vehicle was searched and a baggie containing a green, leafy substance (later field tested positive as marijuana) was found in between the center console and front passenger seat. The subject who was sitting in the front passenger seat, Deshawn Briggs, admitted ownership of the marijuana and said that he did not say anything because he was scared. I placed Deshawn under for Possession of Marijuana (ARS 13-3405A1) at approximately 0148 hours.

At approximately 0213 hours, I read Deshawn his Miranda Warnings. Deshawn informed me that he purchased the marijuana earlier today for \$40.00. Deshawn said that he smokes marijuana to help with the pain caused by his illness, spinal meningitis.

Nothing further.

** If a fugitive arrest, a form IVA must also be completed **

MARICOPA COUNTY JUSTICE COURT PRECINCTS

- | | |
|-----------------------|--------------------------|
| 1. Buckeye | 13. Northwest Phoenix |
| 2. Central Phoenix | 14. Peoria |
| 3. Chandler | 15. Scottsdale |
| 4. East Mesa | 16. South Mesa / Gilbert |
| 5. East Phoenix #1 | 17. South Phoenix |
| 6. East Phoenix #2 | 18. Tempe East |
| 7. Gila Bend | 19. Tempe West |
| 8. Glendale | 20. Tolleson |
| 9. Maryvale | 21. West Mesa |
| 10. North Mesa | 22. West Phoenix |
| 11. North Valley | 23. Wickenburg |
| 12. Northeast Phoenix | |

(Please Refer to Precinct Map)

I certify that the information presented is true to the best of my knowledge.

T. ROLLER #1197
ARRESTING OFFICER . SERIAL NUMBER

GOODYEAR POLICE DEPARTMENT (623) 932-1220
AGENCY / DUTY PHONE NUMBER

12-19-2015
DATE

EXHIBIT 22

1 Timothy J. Eckstein, 018321
Joshua D. Bendor, 031908
2 OSBORN MALEDON, P.A.
2929 N. Central Ave., Suite 2100
3 Phoenix, Arizona 85012-2793
(602) 640-9000
4 teckstein@omlaw.com
jbendor@omlaw.com
5

6 Katherine Chamblee-Ryan
Olevia Boykin
7 CIVIL RIGHTS CORPS
1601 Connecticut Ave. NW, Suite 800
8 Washington, D.C. 20009
(202) 656-5189
9 katie@civilrightscorps.org
olevia@civilrightscorps.org
10

11 Attorneys for Plaintiffs

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE DISTRICT OF ARIZONA

14 Deshawn Briggs, *et. al.*,
15 Plaintiffs,
16 v.
17 William Montgomery, *et. al.*,
18 Defendants.
19

No. CV-18-2684-PHX-EJM
**PLAINTIFF DESHAWN BRIGGS'
THIRD SUPPLEMENTAL¹
RESPONSES TO DEFENDANT
TASC'S FIRST SET OF
INTERROGATORIES, REQUESTS
FOR PRODUCTION, AND
REQUESTS FOR ADMISSION**

20 **INTERROGATORIES**

21 **INTERROGATORY NO. 1:** Explain all actions you have taken to preserve or produce
22 documents relevant to this litigation.

23 **RESPONSE TO INTERROGATORY NO. 1**

24 Since this lawsuit was filed, Plaintiff Briggs has preserved all relevant documents
25 in accordance with his obligations under the federal rules. Specifically, to the extent such
26 documents exist, Plaintiff Briggs has maintained all files related to his participation in
27

28 ¹ Supplemental responses are in bold.

1 TASC; any documentation of his income from any source; and any documentation of his
 2 fixed expenses² during the relevant time-period. The relevant time period is the time that
 3 Plaintiff Briggs was enrolled in the diversion program jointly operated by Defendants
 4 MCAO and TASC. Plaintiff Briggs has turned over all relevant documents in his
 5 possession to his counsel for production. Given that this lawsuit was filed nearly two
 6 years after his participation in MDPP, Defendants are likely to have superior access to
 7 documents in his participant file.

8
 9 **INTERROGATORY NO. 2:** Identify all income you received during the time you
 10 participated in the MDPP, including the source and amount of all such income.

11 **RESPONSE TO INTERROGATORY NO. 2**

12 Plaintiff objects that “income” is vague and undefined. For the purposes of
 13 responding to this interrogatory, however, Plaintiff Briggs understands “income” to
 14 include money he received from any employment or from any benefits program.

15 Plaintiff also objects that this interrogatory is unduly burdensome, and Plaintiff
 16 further objects to this interrogatory on the basis that discovery is ongoing and that Plaintiff
 17 may adduce further information that may be responsive to this interrogatory. Plaintiff
 18 reserves his right to supplement or amend this response. Plaintiff further responds that
 19 documents produced in response to Defendant TASC’s requests for production may
 20 contain additional information responsive to this interrogatory. Subject to these
 21 limitations, Plaintiff Briggs responds as follows:

22 Plaintiff Briggs participated in the MDPP from 2/29/2016 to 8/25/2016. *See*
 23 TASC000059. When Plaintiff Briggs completed an entry form for the MDPP on 2/29/16,

24
 25
 26 ² With respect to expenses, to the best of his recollection, since joining this lawsuit, Mr. Briggs
 27 has had no documentation of any bills from the relevant time period in his custody or control,
 28 including rent and cell phone, both of which were in the names of Mr. Briggs’s family
 members, and not Mr. Briggs. However, if Mr. Briggs remembers or discovers any such
 documents over the course of litigation, he will promptly turn them over to be produced.

1 he reported that he received a monthly disability payment from the Social Security
 2 Administration of \$377 per month and \$31 in food stamps per month. *See* TASC000084.
 3 Over the six months Plaintiff Briggs participated in TASC, records currently available
 4 indicate that he earned approximately \$1,223.20 per month³ pre-tax from his job at
 5 Walmart. Plaintiffs have already produced a detailed paystub history for Plaintiff Briggs.
 6 *See* Plaintiffs004227.

7
 8 **INTERROGATORY NO. 3:** Identify all documentation and information regarding your
 9 financial situation that you provided to TASC while you participated in the MDPP.

10 **RESPONSE TO INTERROGATORY NO. 3**

11 Plaintiff objects that this interrogatory is vague because Defendant TASC did not
 12 define “financial situation,” “documentation,” or what it means for “documentation” to
 13 contain “information regarding [the Plaintiff’s] financial situation.” For the purposes of
 14 responding to this interrogatory, however, Plaintiff construes “financial situation” to
 15 include information about his income, assets, and/or indigency status; “documentation”
 16 to include official documentation originating from some third-party source; and
 17 “documentation” to contain “information regarding [the Plaintiff’s] financial situation”
 18 to mean that the “documentation” directly demonstrated some information about Plaintiff
 19 Briggs’s income, assets, or indigency status.

20 Plaintiff further objects that this interrogatory is unduly burdensome and, by its very
 21 nature, it seeks information over which Defendants have equal or superior access.
 22 Plaintiff objects that discovery is ongoing and that Plaintiff may adduce further
 23 information that may be responsive to this interrogatory. Plaintiff reserves his right to
 24 supplement or amend this response. Plaintiff further responds that documents produced
 25

26
 27 ³ This number was calculated by taking the total amount of wages that Walmart paid
 28 Plaintiff Briggs while he participated in the MDPP and dividing it by 6 months, the
 approximate amount of time Mr. Briggs participated in MDPP.

1 in response to Defendants' requests for production may contain additional information
2 responsive to this interrogatory. Subject to these limitations, Plaintiff responds as follows:

3 Plaintiff Briggs participated in the MDPP from 2/29/2016 to 8/25/2016. *See*
4 TASC000059. Plaintiff Briggs provided TASC with a nutritional assistance (food stamps)
5 award letter proving his eligibility for nutritional assistance. *See* TASC000065. At the
6 time Plaintiff Briggs completed an entry form for MDPP on 2/29/16, he reported that he
7 received a monthly income from Walmart of \$800 per month, a monthly disability
8 payment from the Social Security Administration of \$377 per month, and \$31 in food
9 stamps per month. *See* TASC000084.

10 Plaintiff Briggs also notes that, as alleged in the Second Amended Complaint, the
11 TASC employee who conducted his orientation did not ask Plaintiff Briggs whether he
12 would be able to afford the fees. *See* Doc. 110 ¶ 206. Moreover, as alleged in the Second
13 Amended Complaint, as a matter of official policy, with respect to the program fees, no
14 fee waivers or reductions were available, regardless of Plaintiff Briggs's income. *See* Doc.
15 110 ¶ 154. Consistent with this policy, no TASC employee stated that any waiver or
16 reduction in program fees might be available for him. Nor did any TASC employee
17 inform Plaintiff Briggs that a fee waiver or reduction might be available for urinalysis
18 fees.

19
20 **INTERROGATORY NO. 4:** Explain in detail the bases for your contention that you
21 could not afford to pay MDPP fees, including any reasons why you could not:

- 22 • Borrow money;
- 23 • Work additional hours or an additional job; or
- 24 • Limit expenses.

25 **RESPONSE TO INTERROGATORY NO. 4**

26 Plaintiff objects that this interrogatory is vague because it could encompass a host
27 of complex reasons why Plaintiff is indigent. Moreover, it is unclear what Defendant
28 TASC meant when it asked why Plaintiffs could not "borrow money" or "limit expenses."

1 For the purposes of responding to this interrogatory, Plaintiff construes this question to
2 be limited to the direct, practical reasons the Plaintiff could not take these actions rather
3 than structural reasons why, for example, the Plaintiff lacked an affluent social network
4 or the ability to find a job that offered more hours or better pay. Plaintiff construes
5 “borrow money” to mean to take a loan at the time that diversion payments were due in
6 order to make those payments and that the Plaintiff would be expected to repay at some
7 later date, and Plaintiff construes “limit expenses” to mean spending less money without
8 sacrificing basic necessities.

9 Plaintiff also objects that this interrogatory is unduly burdensome. Plaintiff further
10 objects that discovery is ongoing and that Plaintiff may adduce further information that
11 may be responsive to this interrogatory. Plaintiff reserves his right to supplement or
12 amend this response. Subject to these limitations, Plaintiff Briggs responds:

13 Prior to enrolling in the MDPP, Plaintiff Briggs struggled to cover his basic
14 expenses. Having moved to the area just two years before enrolling, he lacked a network
15 of people who could help him with money. During his participation in the program,
16 Plaintiff Briggs worked at Wal-Mart as a part-time employee only. He did not believe he
17 could have demanded more shifts than the limited amount he was given. As for his ability
18 to “limit expenses,” Plaintiff Briggs had no room in his budget to do so. His income was
19 needed for basic necessities including but not limited to housing, food, laundry, and his
20 cell phone bill. In fact, in some months, his income did not even cover basic necessities.
21 **During Plaintiff’s time on TASC, he typically had nearly \$0 dollars in his bank**
22 **account in the days before getting his paycheck from Wal-Mart.**

23
24 **INTERROGATORY NO. 5:** Describe all interactions you had with TASC
25 representatives in which you informed the representatives that you could not afford to pay
26 the required fees through the MDPP.

27 **RESPONSE TO INTERROGATORY NO. 5**
28

1 Plaintiff objects because this interrogatory is vague because Defendant TASC did
2 not clarify what it meant by “interactions” in which Plaintiff “informed” TASC
3 representatives that they could not afford payments. For the purposes of this interrogatory,
4 Plaintiff construes “interactions” to include all communications in person or via any other
5 medium, including email, text, and phone. Plaintiff further construes this interrogatory to
6 request information about all information that the Plaintiff shared with TASC
7 representatives that would make them reasonably aware that the Plaintiff could not afford
8 to pay fees.

9 Plaintiff also objects that this interrogatory is unduly burdensome. Plaintiff objects
10 that this interrogatory, by its very nature, seeks information over which Defendants have
11 equal or superior access. Plaintiff further objects that discovery is ongoing, and that
12 Plaintiff may adduce further information that may be responsive to this interrogatory.
13 Plaintiff further objects that this interrogatory seeks information with a greater specificity
14 than Plaintiff can reasonably remember. Plaintiff reserves his right to supplement or
15 amend this response. Plaintiff further responds that documents produced in response to
16 Defendants’ requests for production may contain additional information responsive to this
17 interrogatory. Subject to these limitations, Plaintiff Briggs responds as follows:

18 Plaintiff Briggs provided TASC with a nutritional assistance (food stamps) award
19 letter proving his eligibility for nutritional assistance. *See* TASC000065. At the time
20 Plaintiff Briggs completed an entry form for MDPP on 2/29/16, he reported that he
21 received a monthly income from Walmart of \$800 per month, a monthly disability
22 payment from the Social Security Administration of \$377 per month, and \$31 in food
23 stamps per month. *See* TASC000084. In addition, Plaintiff Briggs contacted his case
24 manager, Henry Rojo, on July 14, 2016, and asked for a payment arrangement for the
25 month. *See* TASC000070. This made Defendant TASC aware that he could not afford to
26 pay the fees.

27 Plaintiff Briggs also notes that, as alleged in the Second Amended Complaint, the
28 TASC employee who conducted his orientation did not ask Plaintiff Briggs whether he

would be able to afford the fees. *See* Doc. 110 ¶ 206. Moreover, as alleged in the Second Amended Complaint, as a matter of official policy, with respect to the program fees, no fee waivers or reductions were available, regardless of Plaintiff Briggs's income. *See* Doc. 110 ¶ 154. Consistent with this policy, no TASC employee stated that any waiver or reduction in program fees might be available for him. Nor did any TASC employee inform Plaintiff Briggs that a fee waiver or reduction might be available for urinalysis fees.

INTERROGATORY NO. 6: Explain in detail all instances in which you contacted TASC for the purpose of obtaining information to use in this litigation, including instances in which you contacted TASC prior to the institution of this litigation for the purpose of assessing potential claims.

RESPONSE TO INTERROGATORY NO. 6

Plaintiff objects to the extent that this request seeks information protected by attorney-client and/or work product privileges. Such information is not discoverable thus this request will be construed not to seek such privileged documents. Subject to these limitations, Plaintiff Briggs responds that he never contacted TASC prior to the institution of the litigation for the purpose of assessing potential claims.

INTERROGATORY NO. 7: Identify all expenses you had during your time on the MDPP, including both living and discretionary expenses. For each such expense, identify the amount or approximate amounts owed or paid, the intervals in which such amounts were paid or owed (e.g., monthly, bi-monthly, etc.) and the persons or entities to which such payments were paid or owed.

RESPONSE TO INTERROGATORY NO. 7

Plaintiff objects that this interrogatory is vague because Defendant TASC did not define the term "discretionary." For the purposes of this interrogatory, Plaintiff defines

1 “discretionary” expenses to include all regular expenses other than basic necessities such
2 as shelter, food, clothing, and transportation.

3 Plaintiff also objects that this interrogatory is unduly burdensome. As written, it
4 would require Plaintiff, for example, to identify each and every place he paid money for
5 any meal. Plaintiff further objects that this interrogatory seeks information with a greater
6 specificity than Plaintiff can reasonably remember. Plaintiff further objects that discovery
7 is ongoing and that Plaintiff may adduce further information that may be responsive to
8 this interrogatory. Plaintiff reserves his right to supplement or amend this response.
9 Plaintiff further objects that this request is duplicative of information sought in Defendant
10 TASC’s First Set of Requests for Production, and Plaintiff also notes that information
11 responsive to this request may be found in Plaintiffs’ MIDP Responses. Subject to these
12 limitations, Plaintiff Briggs responds as follows:

13 Plaintiff Briggs estimates that, while on the MDPP, he spent \$500 per month on
14 rent and struggled to allocate the remainder of his income to afford the basic necessities
15 of life, such as food, clothing, laundry, transportation, cell phone service.

16
17 **INTERROGATORY NO. 8:** Identify any person or entity who, in any manner and for
18 any purpose, loaned, gifted, or provided you with any financial assistance in any amount
19 of money over \$50 from August 23, 2016 to the present.

20 **RESPONSE TO INTERROGATORY NO. 8**

21 Plaintiff objects that this interrogatory is vague because Defendant TASC does
22 not specify what it means by “provided you with any financial assistance.” For the
23 purposes of this interrogatory, Plaintiff construes “provided you with any financial
24 assistance” to include monetary gifts (not loans) from private individuals.

25 Plaintiff also objects that this interrogatory is unduly burdensome, and Plaintiff
26 further objects that this interrogatory seeks irrelevant information; the information sought
27 does not pertain to any claim or defense. Moreover, Plaintiff objects that the time period
28 requested (August 23, 2016 to the present) is overbroad and encompasses irrelevant

1 information. Subject to these limitations, Plaintiff Briggs responds that he does not recall
2 receiving any loan, gift, or other financial assistance in any amount of money over \$50.

3
4 **INTERROGATORY NO. 9:** Identify all of your social media accounts for which you
5 had a login and password during your time in the MDPP.

6 **RESPONSE TO INTERROGATORY NO. 9**

7 Plaintiff objects that this interrogatory seeks irrelevant information. The
8 information sought does not pertain to any claim or defense and there are no allegations
9 regarding TASC conduct relating to Plaintiff's social media accounts. No information
10 will be provided in response to this interrogatory.

11
12 **REQUESTS FOR PRODUCTION**

13 **REQUEST FOR PRODUCTION NO. 1:** Please produce all documents identified in,
14 or used to prepare, the responses to the interrogatories above.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1**

16 With the exception of the discovery documents cited herein which Plaintiffs have
17 already produced, no other documents were used to prepare or identified in the
18 interrogatories above. Accordingly, no additional documents will be produced in
19 response to this request.

20
21 **REQUEST FOR PRODUCTION NO. 2:** Please produce all documents supporting
22 your contention that you could not afford to make a payment for the MDPP while you
23 were enrolled in the same, including, but not limited to, documentation reflecting:

- 24 a) your income while on the MDPP;
25 b) any governmental assistance you may have received;
26 c) your balances and available balances with banks and credit cards;
27 d) your expenses; and
28

1 e) any efforts you made to borrow funds.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2**

3 Plaintiff objects to this request as unduly burdensome and vague. Plaintiff further
 4 objects that this request for production seeks documents over which Defendants have
 5 equal or superior access. Plaintiff further objects that this request is duplicative of
 6 information sought in Defendant TASC's First Set of Interrogatories. Subject to these
 7 limitations, Plaintiffs have produced Plaintiff Briggs's pay history from Wal-Mart,
 8 including both his income for the time that he was enrolled in diversion and three months
 9 prior (even though Plaintiffs do not agree that Mr. Briggs's income prior to the time he
 10 enrolled in diversion is relevant and therefore object to Defendants' request for such
 11 information). *See* Plaintiffs004227. Plaintiffs have also produced an official letter
 12 showing Plaintiff Briggs's enrollment in AHCCCS, Arizona's Medicaid Program. *See*
 13 Plaintiffs004133. **Plaintiff Briggs, through counsel, has produced his bank records**
 14 **from the relevant time period.** To the best of his recollection, there are no other
 15 responsive records in Plaintiff Briggs's custody or control. In Plaintiff's Interrogatory
 16 responses, above, Plaintiff also noted a number of Defendant TASC's own documents
 17 that contain responsive information. *See* TASC000065; TASC000084. Any additional
 18 responsive documents that come into Plaintiff's possession or control over the course of
 19 discovery will be produced.

20
 21 **REQUEST FOR PRODUCTION NO. 3:** Please produce all documents supporting the
 22 damages you are seeking in this action.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3**

24 Plaintiff objects to this request as unduly burdensome. Plaintiff further objects that
 25 discovery is ongoing and that Plaintiff may adduce further information that may be
 26 responsive to this interrogatory. Plaintiff reserves his right to supplement or amend this
 27 response. Subject to these limitations and acknowledging Plaintiffs' MIDP responses this
 28 information responsive to this request, Plaintiffs have produced Plaintiff Briggs's pay

1 history from Wal-Mart. *See* Plaintiffs004227. As noted in Plaintiffs' Third Supplemental
2 MIDP Responses, TASC000064 is also relevant to the damages calculation. Any
3 additional responsive documents that come into Plaintiff's possession or control over the
4 course of discovery will be produced.

5
6 **REQUESTS FOR ADMISSION**

7 **REQUEST FOR ADMISSION NO. 1:** Admit that you did not provide any financial
8 documentation confirming income or expense amounts to TASC representatives while
9 enrolled in the MDPP.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 1**

11 Plaintiff denies this request for admission. Plaintiff Briggs provided TASC with a
12 nutritional assistance (food stamps) award letter proving his eligibility for nutritional
13 assistance. *See* TASC000065. Plaintiff Briggs also notes that, as alleged in the Second
14 Amended Complaint, the TASC employee who conducted his orientation did not ask
15 Plaintiff Briggs whether he would be able to afford the fees. *See* Doc. 110 ¶ 206.
16 Moreover, as alleged in the Second Amended Complaint, as a matter of official policy,
17 with respect to the program fees, no fee waivers or reductions were available, regardless
18 of Plaintiff Briggs's income. *See* Doc. 110 ¶ 154. Consistent with this policy, no TASC
19 employee requested Plaintiff Briggs's financial information confirming income or
20 expenses or stated that any waiver or reduction in program fees might be available for
21 him. Nor did any TASC employee inform Plaintiff Briggs that a fee waiver or reduction
22 might be available for urinalysis fees. Plaintiff reserves his right to supplement or amend
23 this response.

24
25 **REQUEST FOR ADMISSION NO. 2:** Admit that you received documents
26 substantially similar to TASC000047-54 to apply for a fee waiver or reduction with the
27 MDPP.

28 **RESPONSE TO REQUEST FOR ADMISSION NO. 2**

1 Plaintiff denies this request for admission.

2
3 DATED this 18th day of June, 2020.

4 /s/Katherine Chamblee-Ryan
5 Katherine Chamblee-Ryan
6 Olevia Boykin
7 CIVIL RIGHTS CORPS
8 1601 Connecticut Ave. NW, Suite 800
9 Washington, D.C. 20009

10 Timothy J. Eckstein
11 Joshua D. Bendor
12 OSBORN MALEDON
13 2929 N. Central Ave., Suite 2100
14 Phoenix, Arizona 85012

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28 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, the attached document was served via CM/ECF upon counsel for all Defendants.

/s/Katherine Chamblee-Ryan
Katherine Chamblee-Ryan

EXHIBIT 23

IN THE AGUA FRIA JUSTICE COURT
STATE OF ARIZONA, COUNTY OF MARICOPA

RELEASE QUESTIONNAIRE

Information to be supplied by a prosecutor or law enforcement officer

STATE OF ARIZONA vs. LUCIA SORIA

DOB [REDACTED] CASE / BK. NO. 2018-47081

A. GENERAL INFORMATION

- Charge and class:
13-3405A1 F6
13-3415A F6
- Offense Location: NORTH DYSART ROAD / W VAN BUREN
AVONDALE, AZ
Date: 12/02/18 Time: 0035
- Arrest Location: NO ARREST
Date: _____ Time: _____

B. CIRCUMSTANCES OF THE OFFENSE

- Was a firearm or other weapon used?
☐ Yes ☒ No
Type of weapon: _____
Was anyone injured by the defendant?
☐ Yes ☒ No
Was medical attention necessary?
☐ Yes ☒ No
Nature of injuries:
- Was anyone threatened by the defendant?
☐ Yes ☒ No
Nature & extent of threats: _____
- If property offense, value of property taken or damaged:
0
Was property recovered?
☐ Yes ☒ No

C. CIRCUMSTANCES OF THE ARREST

- Did the defendant attempt to:
Avoid arrest? ☐ Yes ☒ No
Resist arrest? ☐ Yes ☒ No
Explain: _____
- Was the defendant armed when arrested?
☐ Yes ☒ No
Type of weapon: _____
- Was evidence of the offense found in the defendant's possession?
☒ Yes ☐ No
Explain: WITHIN VEHICLE WITH SUBJECT A SMALL
USABLE AMOUNT OF MARIJUANA WAS LOCATED, AS
WELL AS TWO GLASS MARIJUANA PIPES
- Was the defendant under the influence of alcohol or drugs at the time of the offense?
☐ Yes ☒ No ☐ Unk

CRIMES OF VIOLENCE

- Relationship of defendant to victim:
Do the victim and defendant reside together?
☐ Yes ☐ No
- How was the situation brought to the attention of the police?
☐ Victim
☐ Third party
☐ Officer observed
- Have there been any previous incidents involving these same parties?
☐ Yes ☐ No
Explain: _____
- Is defendant currently the subject of:
☐ An order of protection
☐ Injunction against harassment
☐ Any other court order
Explain: _____

D. OTHER INFORMATION

- Is the defendant presently on probation, parole or any other form of release involving other charges or convictions?
☐ Yes ☒ No
Explain: _____
- List any prior arrests, convictions, and / or F.T.A.'s:
None
- Is there any indication the defendant is:
☐ An alcoholic? ☐ An addict?
☐ Mentally disturbed? ☐ Physically ill?
☐ Any other court order?
- Is the defendant currently employed?
☐ Yes ☒ No
With whom _____
How long _____
Nature of employment _____
- Where does the defendant currently reside?

With whom _____
How long _____
- What facts indicate the defendant will flee if released
Explain: _____
N/A
- What facts does the State have to oppose an unsecured release? Explain:
N/A

E. DRUG OFFENSES

1. If the defendant is considered a major drug dealer, please state the supporting facts:
None

2. What quantities and types of illegal drugs are directly involved in this offense?
SMALL AMOUNT OF MARIJUANA FOR PERSONAL USE

Approximate monetary value: \$15
3. Was any money seized?
☐ Yes ☒ No
Amount: \$ _____
4. Were any automatic weapons in the possession of the defendant at the time of the arrest?
☐ Yes ☒ No
Quantity and type: _____

ON 12/02/18 AT APPROXIMATELY 0035 HOURS A TRAFFIC STOP WAS CONDUCTED ON AN ACURA MDX FOR FAILING TO MAINTAIN LANE IN THE AREA OF NORTH DYSART ROAD AND WEST VAN BUREN STREET WITHIN AVONDALE, AZ. THE OCCUPANTS OF THE VEHICLE WERE IDENTIFIED AS LUCIA SORIA, ANTHONY LOPEZ, AND PAUL DIAZ. DURING THE STOP A PROBABLE CAUSE SEARCH OF THE VEHICLE WAS CONDUCTED BASED ON THE ODOR OF MARIJUANA. DURING THE SEARCH OFFICERS LOCATED A SMALL USUABLE AMOUNT OF A GREEN LEAFY SUBSTANCE LATER FIELD TESTED TO BE MARIJUANA. ALSO LOCATED WERE TWO GLASS PIPES COMMONLY USED TO SMOKE MARIJUANA. AN INDIVIDUAL INTERVIEW WAS COMPLETED UNDER MIRANDA WITH ALL OCCUPANTS. ALL THREE SUBJECTS ADMITTED THE MARIJUANA BELONGED TO ALL OF THEM. ALL SUBJECTS PUT FORTH MONEY TO BUY THE MARIJUANA AND SMOKE THE MARIJUANA TOGETHER. NONE OF THE THREE HAVE A VALID MEDICAL MARIJUANA CARD.

SECTION III: Probable Cause Statement

1. Please summarize and include the information which establishes probable cause for the arrest:

** If a fugitive arrest, a form IVA must also be completed **

MARICOPA COUNTY JUSTICE COURT PRECINCTS

- | | |
|-----------------------|--------------------------|
| 1. Buckeye | 13. Northwest Phoenix |
| 2. Central Phoenix | 14. Peoria |
| 3. Chandler | 15. Scottsdale |
| 4. East Mesa | 16. South Mesa / Gilbert |
| 5. East Phoenix #1 | 17. South Phoenix |
| 6. East Phoenix #2 | 18. Tempe East |
| 7. Gila Bend | 19. Tempe West |
| 8. Glendale | 20. Tolleson |
| 9. Maryvale | 21. West Mesa |
| 10. North Mesa | 22. West Phoenix |
| 11. North Valley | 23. Wickenburg |
| 12. Northeast Phoenix | |

JUDICIAL OFFICER REVIEW
OF PROBABLE CAUSE
STATEMENT AND COMPLAINT
ON OATH OR AFFIRMATION

(Please Refer to Precinct Map)

- ☐ Complaint Review
- ☐ Witness sworn
- ☐ Reviewed Form IV
- ☐ Other sources: _____
- ☐ PC determined

I certify that the information presented is true to the best of my knowledge.

M. PITCHER 1275

ARRESTING OFFICER - SERIAL NUMBER

GOODYEAR POLICE DEPARTMENT (623) 932-1220
AGENCY / DUTY PHONE NUMBER

Judicial Officer

01/17/19
DATE

MC-00633

EXHIBIT 24

Declaration of Lucia Soria

I, Lucia Soria, declare and affirm as follows:

1. I am over the age of eighteen and competent to make this Declaration.

2. The matters set forth herein are true and correct of my own personal knowledge.

3. I am a Named Plaintiff in the above-captioned litigation.

4. At the advice of my doctor, I left my job as an Assistant Manager at Dollar Tree on November 30, 2018. In December 2018, I applied for disability benefits, and expected that it could take up to two years for me to receive any assistance, based on research that I did on the internet about long it usually takes for people to get disability benefits after applying for them.

5. A few weeks after leaving my job at Dollar Tree, I began helping my mother Esther Lopez with her babysitting job. My mother paid me in cash, but she sometimes didn't pay me directly and just used what she would have paid me to pay the money I owed her for rent and other bills. When I was on TASC, I made approximately \$100 to \$250 per month, including the amount she kept to pay money I owed her for rent and bills. So I did not actually get the full \$100 to \$250 per month in cash. I can't remember making more than \$250 in a month when I was on TASC. I made no more than \$2,000 total for 2019 through this babysitting. Again, that includes the money she kept for what I owed her for rent and bills, so I didn't get all of this directly in cash.

6. Around September 2019, after I had completed TASC, I applied for and got a seasonal job as a picker for beauty products at a Macy's warehouse. I believe that I had heard about the opportunity through word of mouth. During my deposition, I had forgotten I had this temporary job in 2019.

7. I applied for the job at Macy's warehouse because I was desperate for income. I had not received an answer on my disability benefits application. My doctor had not told me that it was okay to work either. When I received the job, I knew that it

1 was only temporary employment. Because I needed the income to cover expenses at the
2 time, I did not think that I had any other choice but to take the job.

3 8. The Macy's job, which required standing for extended periods of time,
4 was hard for me because of my medical issues. I would often get dizzy. Every ten
5 minutes, I would have to sit down for a break because I felt very tired. I had to bring a
6 heart monitor to work because I began having heart palpitations on the job. I believe
7 that these heart palpitations were caused by the work, because I had not experienced
8 them like that before. Because of my health issues, I had to miss about three or four full
9 days of work and also had to leave work early on at least two occasions.

10 9. Shortly before I started on TASC, my friend Noemy Flores lent me \$400.
11 I used most of these funds for paying TASC and for gas, but I am not sure of the exact
12 breakdown. I believe that I may have also used some of this money for food.

13 10. While I was on TASC, my boyfriend Travis Avilla helped me cover some
14 expenses, including paying for my meals a couple of times a month and also
15 contributing toward car insurance payments. I believe that Travis spent anywhere from
16 a couple hundred of dollars, but no more than \$1,000, assisting me with these expenses
17 during all of 2019.

18 11. In addition to the financial support that I received from Noemy and
19 Travis, I also asked my parents, my daughter Jazlyn Soria, and my cousin Paul Diaz if I
20 could borrow money while I was on TASC. My mother, daughter, and cousin all
21 provided me with financial support. This support was not a gift. I understood that I
22 needed to pay back whatever they lent me and that it would not be right under the
23 circumstances to continue asking my family for more money until I had paid them back.
24 However I believe that I asked my cousin for more money to pay for gas while I was on
25 TASC, even though I still owed him money. And, I kept asking my boyfriend for
26 assistance in the form of meals and insurance payments while I was on TASC even
27
28

1 though I still owed him money too. I also kept asking my daughter, and she eventually
2 said she couldn't help me anymore.

3 12. I paid off the loans from my friend Noemy Flores little by little, but I am
4 still paying back money that my parents lent to me, including the breaks they gave me
5 on rent and other bills I needed to pay to live with them at their house. I also had debt
6 that I owed while I was on diversion. In credit cards, I had to pay at least \$30 a month
7 on one credit card, for Victoria Secret, and at least \$25 on the other, from Forever21.
8 Both of those balances were from before I started diversion, and the monthly amount
9 eventually went up because of the fees for not paying them off. I still owe credit card
10 debt.

11 13. Since my deposition, I remembered that my mother did have another
12 source of income in 2019, other than babysitting. She took care of my grandmother at
13 home and she got paid for that somehow as a home living assistant. I forgot because she
14 just did this work at home. I don't know the details, but she was somehow getting some
15 kind of money from taking care of my grandmother.

16 14. While I was on TASC, I re-used the insulin needles that I needed so I
17 could afford them and also keep up with other expenses. My health insurance did not
18 want to cover the cost of insulin needles. As a result, I re-used them for a couple of
19 months, but I stopped when I heard that it could lead to an infection.

20 15. While I was on TASC, I had a hard time paying for my kids' school
21 supplies, which included notebooks, papers, and pencils. My children's father does not
22 help with covering these school-related costs.

23 16. In my deposition, I said I thought I had used my daughter's credit card to
24 pay for TASC before, but TASC is saying that all my payments to them were on my
25 card. I must have misremembered, but I did sometimes put cash on my daughter's card
26 and use it at that time. It must have been for other bills.

1 17. TASC mentions a charge on my account at Knott's Berry Farm, which is a
2 theme park in California, as evidence that I had enough money to pay for TASC. I went
3 there with my kids, and the expense was for them. Because of my medical issues,
4 especially vertigo, I am not able to go on the rides myself. My children's father does not
5 provide or fund any entertainment or recreation for them, and I feel that I need to give
6 them at least what I can because there's no one else who will. They have always done
7 very well in school and are good kids, so I try to treat them once in a while when it's
8 possible.

9 18. While I was on TASC, I paid between \$80 to \$400 to my parents every
10 month as rent and also to cover other expenses I was supposed to pay. I was supposed to
11 be paying them \$500 every month, which was how much I paid them every month when
12 I worked at Dollar Tree, and when I worked overtime, I would pay them about \$100 for
13 utilities. But I could not afford to pay \$500 a month while I was on TASC because I was
14 not able to work, so they let me pay as much as I could. When I gave them the \$80 to
15 \$400, they could use it for either rent or utilities, so when I say that money is for rent, I
16 mean it's for both rent and the utilities.

17 19. On my bank statements that TASC mentions, the charges from Cox
18 Communications for were for internet service. Also, my bank statements show a lot of
19 the bills I had to pay while I was on diversion. I did not know how to get my bank
20 statements and before I got them, I tried to remember how much my different bills cost
21 while I was on TASC. My lawyers from this case got my bank statements for me, and
22 then I was able to see what I paid for different bills.

23 20. TASC also points to a \$216.60 withdrawal from PayPal from my bank
24 account on April 26, 2019. I do not remember what that purchase was for, even though I
25 have tried to figure it out. Sometimes, I make purchases for members of my family on
26 my account and then they pay me back in cash or send me a transfer. I am not sure
27
28

1 whether that purchase was for myself or if someone else paid for that charge and I just
2 used my card for them.

3 21. TASC mentioned that I made very frequent purchases at gas stations. I
4 made those many purchases because I would not fill up my gas tank fully since I didn't
5 think I could afford to buy that much at one time. I would put in \$5 or \$10 at a time
6 because I knew I would be able to pay for that. Because I didn't fill up my gas tank, my
7 car ran out of gas while I was driving a couple of times, including while I was on
8 TASC.

9 22. TASC also mentioned charges from Apple iTunes, Amazon Prime, and
10 Amazon Digital. I believe that those purchases were for entertainment for my kids and
11 that they paid me back for them with cash. I don't buy things from those places for
12 myself. The Hulu and Netflix subscriptions are also for my kids. The Redbox charge
13 and charges at Harkins Estrella were for movies for my kids. I don't know what the
14 charges from Westsidedbe or Morongo Band are or whether I made those for myself.

15 23. To the best of my knowledge, I only tested positive for alcohol once while
16 I was on TASC in April 2018.

17 24. I did my best to pay the TASC fees, and I paid as much as I could while I
18 was on the program. No one at TASC asked me if I could afford the fees or offered me
19 any kind of financial assistance. No one asked me for any documents to show my
20 financial situation either. They didn't tell me any kind of assistance was available. That
21 would have been nice if they had, and I definitely would have wanted that help. The
22 first time I heard about any assistance was after my lawyers from this reached out about
23 my situation and then the county said I didn't have to pay the rest of my balance.

24
25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed this 4/26/2021 day of April, 2021.

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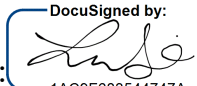
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Lucia Soria

EXHIBIT 25



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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

Deshawn Briggs, *et. al.*,

Plaintiffs,

v.

Allister Adel, *et. al.*,

Defendants.

No. CV-18-2684-PHX-EJM

**PLAINTIFFS' FOURTH
 SUPPLEMENTAL MANDATORY
 INITIAL DISCOVERY RESPONSES**

Plaintiffs submit their **Fourth Supplemental** responses to the Mandatory Initial Discovery Requests, pursuant to General Order 17-08 and this Court's Preliminary Order ("Preliminary Order"), *see* Doc. 10. Supplemental information is in **bolded** type.

This matter is in discovery, and further investigation and discovery may bring to light additional information that might alter or add to Plaintiffs' factual disclosure, legal theories, witnesses, and exhibits. These disclosures do not waive the Plaintiffs' right to object to the relevance, materiality or admissibility of the information as evidence in the

litigation. Plaintiffs reserve the right to supplement or amend this disclosure statement in accordance with General Order 17-08 and the Preliminary Order. If any part of these responses is ever read at trial, fairness requires that this Preliminary Statement also be read, indicating that at the time it was filed, Plaintiffs had only acquired limited information.

I. Persons with Discoverable Information

Plaintiffs believe that the following individuals are likely to have discoverable information relevant to this case. Plaintiffs will continue their investigation regarding which other individuals may have discoverable information relevant to this case and reserve the right to supplement this disclosure as discovery progresses.

1. All (a) current participants in the MCAO-TASC Marijuana Deferred Prosecution Program (“MDPP”) and (b) past participants in the MDPP who were subject to the challenged policies, *see* Infra IV.B, **including all individuals who received a pre-file option letter. See Plaintiffs00022-000925; Plaintiffs000952-001372; Plaintiffs001373-001383; Plaintiffs001386; Plaintiffs003131.**¹ Their names and addresses are known to Defendants. Current and past participants are likely aware of representations made by MCAO and TASC regarding the policies challenged in this case (both verbally and in writing), and they are aware of how those policies were implemented in their individual cases.
2. Former Maricopa County Attorney William Montgomery and current County Attorney Allister Adel. Their contact information is known to Defendants. Both are likely aware of the challenged policies in this case, including but not limited to: (1) MCAO’s specific role in creating and implementing the challenged policies; (2) how employees and/or agents were instructed to implement these policies; (3) how the policies were formed; (4) how the policies were portrayed in both internal and

¹ Plaintiffs disclosed the names of all individuals known by Plaintiffs to have received a pre-file option letter in its Mandatory Initial Disclosures. The names and addresses of these persons are known to Defendants. Plaintiffs cite their productions containing these names for completeness.

1 external program documents; (5) what documents exist that might detail the
2 existence, origins, and/or implementation of the policies; (6) whether and how the
3 policies have changed over time; and (7) how the policies were carried out in
4 individual cases.

5 3. All (a) current employees and/or agents of TASC involved in the administration of
6 the MDPP and (b) past employees and/or agents of TASC involved in the
7 administration of the MDPP. These include, but are not limited to, Josh Moreno,²
8 Yolonda Brooks, Henry Rojo, Juanita Davis, Nandi Muhammed, LuAnn Zant,
9 Viviana Garcia, Leticia Nugent, and Arnetia Cardona, all of whom are current or
10 former TASC case managers who routinely handled the administration of the
11 program and issues of payment in individual participants', including Named
12 Plaintiffs', cases. Their names and addresses are known to Defendants. Current and
13 past employees and/or agents of TASC are likely aware of the challenged policies
14 in this case, including but not limited to: (1) TASC's specific role in creating and
15 implementing the challenged policies; (2) how employees and/or agents were
16 instructed to implement these policies; (3) how the policies were formed; (4) how
17 the policies were portrayed in both internal and external program documents; (5)
18 what documents exist that might detail the existence, origins, and/or
19 implementation of the policies; (6) whether and how the policies have changed over
20 time; and (7) how the policies were carried out in individual cases.

21 4. All (i) current employees and/or agents of MCAO involved in the administration
22 of the MDPP and (ii) past employees and/or agents of MCAO involved in the
23 administration of the MDPP. Their names and addresses are known to Defendants.
24 Current and past employees and/or agents of MCAO are likely aware of the
25 challenged policies in this case, including but not limited to: (1) MCAO's specific
26 role in creating and implementing the challenged policies; (2) how employees

27 ² Plaintiffs previously disclosed Josh Moreno in an email to Defendants on September 27,
28 2019.

1 and/or agents were instructed to implement these policies; (3) how the policies
2 were formed; (4) how the policies were portrayed in both internal and external
3 program documents; (5) what documents exist that might detail the existence,
4 origins, and/or implementation of the policies; (6) whether and how the policies
5 have changed over time; and (7) how the policies were carried out in individual
6 cases.

7 5. All (i) current TASC board members and executives and (ii) individuals who have
8 served as TASC board members or executives. Their names and addresses are
9 known to Defendants. Current and past TASC board members are likely aware of
10 the challenged policies in this case, including but not limited to: (1) TASC's
11 specific role in creating and implementing the challenged policies; (2) how
12 employees and/or agents were instructed to implement these policies; (3) how the
13 policies were formed; (4) how the policies were portrayed in both internal and
14 external program documents; (5) what documents exist that might detail the
15 existence, origins, and/or implementation of the policies; (6) whether and how the
16 policies have changed over time; (7) the salaries and financial compensation
17 received by TASC executives.

18 6. All criminal defense attorneys and their agents who have represented persons who
19 enrolled in the MDPP. Their names and addresses are known to Defendants.
20 Criminal defense attorneys and their agents who have represented persons who
21 enrolled in the program are likely aware of representations to their clients made by
22 MCAO and TASC that are relevant to the challenged policies and how the
23 challenged policies were implemented in their clients' cases.

24 7. Deshawn Briggs, **Antonio Pascale, as representative of the estate of** Mark
25 Pascale, and Lucia Soria are Named Plaintiffs in this case and have knowledge
26 regarding the allegations set out in the First Amended Complaint, Doc. 20, and the
27 Second Amended Complaint, Doc. 110, including how the challenged policies
28

were carried out in their individual cases. C/O **Katherine Chamblee-Ryan**, Civil Rights Corps; 1601 Connecticut Ave. NW, Suite 800; Washington, D.C. 2006.

8. Megan Cassidy and Ray Stern are journalists who have written about the MDPP. *See, e.g.*, Doc. 20 at ¶5 n.4. They are likely to have information relating to the amount of money Defendants have collected from participants in the MDPP and the compensation of TASC executives. Ms. Cassidy is employed at the San Francisco Chronicle, 901 Mission St, San Francisco, CA 94103. Mr. Stern is employed at the Phoenix New Times, 1201 E Jefferson St, Phoenix, AZ 85034.

II. Written or Recorded Statements

At this time, Plaintiffs are aware of no written or recorded statements relevant to the claims or defenses in this action.

III. Tangible Evidence and Documents

Plaintiffs have produced with their initial responses relevant documents, electronically stored information (ESI)³ and tangible things required by this mandatory disclosure instead of listing them (Plaintiffs000001 - Plaintiffs004052). *See* Doc. 10-1 at 7. Plaintiffs produced additional documents and ESI with their first supplemental response and will continue collecting emails responsive to the MIDP, which they will produce in a timely manner (Plaintiffs004053 - Plaintiffs004072). With **their** second supplemental response, Plaintiffs further **produced** additional documents and ESI (Plaintiffs004073 - Plaintiffs004134) including financial documentation for Plaintiffs Collier, Briggs and Soria. As discussed in Section VI, Plaintiffs have requested and will continue to produce relevant financial information from third parties on a rolling basis. In addition, relevant documents, ESI, and tangible things known by plaintiffs to exist are listed below by category.

- The TASC program files of the Named Plaintiffs, on file with Defendants;

³ Although the timeline for producing ESI is 40 days after serving these initial responses, Doc. 10-1 at 9, Plaintiffs have produced ESI with these responses and will supplement production as the Preliminary Order requires.

- 1 • The TASC program files of all participants (current and former) who were
- 2 subject to the challenged policies, on file with Defendants;
- 3 • Correspondences between Named Plaintiffs and agents and employees of
- 4 TASC and MCAO; and
- 5 • Documents and ESI reflecting that Named Plaintiffs could not afford to
- 6 pay fees associated with the MDPP.

7 Plaintiffs will continue their investigation into additional relevant tangible
 8 evidence, ESI, and documents, and reserve the right to supplement this disclosure as
 9 discovery progresses.

10 **IV. Statement of Facts Relevant to Plaintiffs' Claims**

11 The following facts are relevant to Plaintiffs' claims. These facts and additional
 12 factual detail are alleged in Plaintiffs' First and Second Amended Complaint, which
 13 Plaintiffs incorporate here. *See* Doc. 20. The facts provided in the First and Second
 14 Amended Complaint regarding Individual Plaintiffs Deshawn Briggs, **Antonio Pascale,**
 15 **as representative of the estate of Marc Pascale, and** Lucia Soria, whose contact
 16 information is provided in Section I, are also relevant to their claims and are summarized
 17 briefly below.

18 **A. Background**

19 For most people who are arrested in Maricopa County, Arizona for simple
 20 possession of marijuana or marijuana paraphernalia, the only way to avoid felony criminal
 21 prosecution is to complete a diversion program offered by MCAO—Marijuana Deferred
 22 Prosecution Program (“MDPP”). MCAO’s final policymaker is Defendant Bill
 23 Montgomery, in his official capacity. To operate the possession of marijuana diversion
 24 program, MCAO partners with Defendant TASC, a private, non-profit company. Between
 25 2011 and 2017, more than 15,000 people participated in the MDPP.

26 People arrested for simple possession of marijuana or marijuana paraphernalia can
 27 enter the program before or after criminal charges are filed. Those who enter the program
 28 post-filing have charges filed against them before they enter the program. Once the person

1 enters the program, those charges are suspended. If the person successfully completes the
2 program, MCAO dismisses the case.

3 Individuals who enter the program before criminal charges are filed are sent a letter
4 from MCAO inviting them to participate. The letter informs them that they are facing
5 class 6 felony charges and offers them two options: criminal prosecution or diversion.
6 The letter also falsely threatens that criminal conviction could result in up to two years in
7 prison and a fine of up to \$150,000 plus an 80% surcharge. If the person who receives the
8 letter completes the diversion program, MCAO will not file charges against her. Failing
9 the program results in felony criminal prosecution.

10 In order to enroll in diversion, both pre- and post-file participants must sign a
11 statement of facts admitting their guilt. A TASC employee tells participants exactly what
12 to write in the statement of facts. The signed statement can be used against a person if she
13 is unable to complete the marijuana diversion program and is criminally prosecuted.

14 Once enrolled in the marijuana diversion program, the requirements for pre- and
15 post-file participants are the same. To complete the program, participants must (1) pay all
16 required program fees, which amount to \$950 or \$1000; (2) pay for and pass random
17 urine-tests for drugs and alcohol for 90 days; and (3) complete a three-hour drug
18 education seminar.

19 Participants must also comply with any other requirements and restrictions
20 imposed by Defendants. Many of these requirements and restrictions are detailed in a
21 document called the "Client Contract." According to the Client Contract, individuals on
22 diversion supervision are barred from drinking alcohol, taking certain medications (like
23 NyQuil) that might include alcohol, and leaving the county for more than one day or the
24 state for any period of time without permission from Defendant TASC. They are also
25 barred from taking any prescription medication without reporting it to a TASC case
26 manager and bringing the prescription to TASC for verification. And unless disability
27 status applies, they must remain employed. In addition, participants must pay the required
28

1 program fees at a fixed minimum monthly rate of \$160 or \$170 per month. Violation of
2 any of these requirements can result in termination from the program.

3 Defendants MCAO and TASC advertise the diversion program as “user-funded,”
4 which means that the program’s participants bear the costs of the program. Defendant
5 TASC is responsible for collecting fees from the people enrolled in the diversion program,
6 and it keeps a portion of the money it collects. Out of the program fees that Defendant
7 TASC collects, \$650 is deposited to MCAO. Between 2006 and 2016, MCAO made
8 nearly \$15 million in fees from participants in the marijuana diversion program.
9 Defendant TASC has also benefited from operating it; its net assets were approximately
10 \$18 million in 2016, and since 2014, it has paid its CEOs and former CEOs between
11 \$281,165 and \$963,358.

12 **B. The Challenged Policies**

13 Defendants’ diversion program discriminates against people who are too poor to
14 pay fees. Under Defendants’ wealth-based termination policy, individuals who cannot
15 pay certain fees are terminated from diversion and face felony criminal prosecution.
16 Wealth-based terminated can happen in at least two ways. First, pursuant to Defendants’
17 written policy, failure to pay program fees at the monthly rate set by Defendant TASC
18 will result in termination from the program. The Client Contract, to which all participants
19 are subject, states that the minimum monthly rate is \$160 or \$170. The Client Contract
20 states: “Failure to make payments [toward the program fees] each month as agreed will
21 result in [the] case being returned for prosecution.” Another paragraph of the Client
22 Contract states that “failure to make payments as agreed may result in unsuccessful
23 termination from the program.” Defendants policy does not include any exception for
24 participants who did not make their monthly payment solely because they could not afford
25 it. Nor do Defendants inquire into a participant’s ability to pay before setting the
26 minimum monthly fee.

27 Second, Defendants do not allow diversion participants to take the program’s
28 mandatory urinalysis tests unless they can pay for them at the time of the test. The Client

1 Contract states that “failure to test as scheduled . . . may result in unsuccessful termination
2 from the program. Missed urinalysis tests are counted as “violations,” even when a person
3 only missed the test because she could not afford to pay for it. A person who accrues too
4 many of these violations will be failed by TASC and referred to MCAO for prosecution.
5 TASC does not have a policy of assessing a person’s ability to pay before referring her
6 for prosecution because she did not pay for drug-and-alcohol tests. Moreover, according
7 to Defendants’ written policy, even in the rare cases where fee reductions are granted, full
8 fees can be reinstated for a dirty or diluted urine test. Defendants’ Client Contract warns,
9 “If [a participant’s] fees are reduced and [the participant] submit[s] a
10 positive/diluted/altered urine test, full fees may be reinstated . . . from that point forward
11 until completion of the program.”

12 Under Defendants’ wealth-based extended supervision policy, people who cannot
13 afford to pay the program fees—which are \$950 or \$1000—in full within 90 days are not
14 released from diversion supervision, even if they have completed all of the non-monetary
15 program requirements. Instead, these individuals must remain on the program for at least
16 six months. If, at the end of six months, they have still not paid the program fees in full,
17 they must remain on the program until they do so. Defendants do not assess participants’
18 ability to pay before refusing to consider them for program completion after 90 days
19 solely based on non-payment. Nor do Defendants assess participants’ ability to pay before
20 requiring them to remain on diversion beyond six months and until all fees are paid.
21 Defendants do not waive or reduce program fees under any circumstances. In addition to
22 payment of program fees, Participants can also be required to remain on diversion
23 supervision if they miss mandatory urinalysis solely because they cannot afford to pay
24 for it.

25 People forced to remain on diversion supervision solely because they cannot afford
26 to pay fees remain subject to criminal prosecution until they complete the program. These
27 pay-only participants are also subject to the same requirements as apply during the first
28

1 90 days of supervision, including all of the requirements and restrictions set forth in the
2 Client Contract (and any others imposed by Defendants).

3 In addition, pay-only participants must continue to submit to random urinalysis.
4 To fulfill this requirement, participants must call TASC or check an application every
5 day, seven days a week, to determine whether they are required to report to a TASC
6 location during a certain time period that day so that TASC can collect and test their urine.
7 When a test is required, participants must pay \$15 or \$17 for each urinalysis test at the
8 time of the test. As a result, pay-only participants may ultimately have to pay hundreds
9 of dollars more than people wealth enough to pay the program fees and complete
10 diversion within 90 days. Testing is required at least once, and potentially multiple, times
11 per week. Records obtained as part of the preliminary investigation for this lawsuit
12 revealed that participants may be required to test as often as nine times per month.

13 The urinalysis tests are invasive. At a TASC location, TASC employees watch
14 participants through glass panels while they submit urine for drug and alcohol testing. In
15 at least one TASC location, the bathroom where participants submit urine for testing
16 includes multiple mirrors so that a TASC employee can watch the participant urinate from
17 multiple angles.

18 **C. Individual Plaintiffs' and Class Representatives' Experiences**

19 Each Individual Plaintiff and Class Representative's experience participating in
20 the MDPP includes relevant facts that provide a basis for Plaintiffs' claims. These are
21 described in detail in Plaintiffs' First Amended Complaint, *see* Doc. 20, and Second
22 Amended Complaint, *see* Doc. 110, and summarized below.

23 Plaintiff Deshawn Briggs is a representative of the damages class in this lawsuit.
24 Despite completing all the non-financial requirements of the MDPP in 90 days, Mr.
25 Briggs was forced to remain in the program for additional months, and subject to
26 numerous urinalysis tests as well as the possibility of felony criminal prosecution, solely
27 because he could not afford to pay program fees.

1 Plaintiff **Antonio Pascale, as representative of the estate of Mark Pascale**, is a
 2 representative of the damages class in this lawsuit. Despite completing all the non-
 3 financial requirements of the MDPP in 90 days, Mr. Pascale was forced to remain in the
 4 program for additional months, and subject to numerous urinalysis tests as well as the
 5 possibility of felony criminal prosecution, solely because he could not afford to pay
 6 program fees.

7 Plaintiff Lucia Soria is a representative of the damages and injunctive classes in
 8 this lawsuit. At the time of filing the Second Amended Complaint, Ms. Soria faced an
 9 ongoing threat of extension on or termination from the program solely because of her
 10 inability to pay program fees. Despite completing all the non-financial requirements of
 11 the MDPP in 90 days, Ms. Soria was forced to remain on the program for additional time,
 12 and subject to numerous urinalysis tests as well as the possibility of felony criminal
 13 prosecution, because she could not afford to pay program fees.

14 As detailed below, each Plaintiff had or is at risk of having their Fourth and
 15 Fourteenth Amendment Rights violated.

16 **V. Legal Basis for Claims**

17 Plaintiffs allege that Defendants' policies violate (1) their rights to equal protection
 18 and due process under the Fourteenth Amendment to the U.S. Constitution, and (2) their
 19 Fourth Amendment rights under the U.S. Constitution.

20 **A. Equal Protection-Due Process Claims**

21 Counts I, II, and III of Plaintiffs' First and Second Amended Complaint allege
 22 violations of equal protection and due process under the Fourteenth Amendment. In
 23 *Bearden v. Georgia*, 461 U.S. 660 (1983), the U.S. Supreme Court explained that equal
 24 protection and due process principles apply when individuals are subject to certain
 25 restrictions and sanctions in the criminal system solely because of their poverty, and it
 26 prescribed a balancing test that applies in that context. Each of the policies challenged in
 27 this case fail that balancing test and are therefore unconstitutional.
 28

1 **B. Fourth Amendment Claims**

2 Counts IV and V of Plaintiffs' First and Second Amended Complaint allege that
 3 Defendants' wealth-based extended urinalysis policy violates the Fourth Amendment.
 4 Urinalysis constitutes a search under the Fourth Amendment. *See Skinner v. Railway Lab.*
 5 *Execs. Ass'n*, 489 U.S. 602, 617 (1989). For a search to pass muster under the Fourth
 6 Amendment, it must be reasonable. *Vernonia School Dist. 47J v. Acton*, 515 U.S. 646,
 7 652 (1995). A more demanding reasonableness test applies to suspicionless searches like
 8 those at issue in this case. *See B.C. v. Plumas Unified School Dist. 47J*, 192 F.3d 1260,
 9 1267 (9th Cir. 1999). Defendants' policy of imposing random searches on individuals for
 10 a longer period of time solely because those individuals could not afford a sum of money
 11 is unreasonable under any standard and is therefore unconstitutional.

12 **VI. Legal and Factual Basis for Class Certification**

13 The named Plaintiffs bring this case as a class action pursuant to Rules 23(a),
 14 23(b)(2), and 23(b)(3) of the Federal Rules of Civil Procedure. The Classes are defined
 15 as follows:

- 16 a. Damages Class: All people who, **at any time** since August 23, 2016, and
 17 until the trial of this case, (1) were enrolled in the marijuana diversion
 18 program operated by Defendants TASC and MCAO; (2) **while so enrolled**,
 19 satisfied all program requirements in the first 90 days of the program other
 20 than payment of program fees; and (3) **while so enrolled**, were not
 21 considered for successful completion after 90 days solely because they were
 22 unable to pay the required fees. Named Plaintiffs Deshawn Briggs, Lucia
 23 Soria, **and Antonio Pascale in his role as Personal Representative of**
 24 **Mark Pascale's estate** seek certification of this class.
- 25 b. Injunctive Class: All people who (1) have not yet been formally charged
 26 with possession of marijuana; and (2) are unable to pay the required fees
 27 within 90 days, **at the time**, and/or at the rate required by Defendant TASC.
 28 Named Plaintiff Lucia Soria seeks certification of this class.

1 The class members are readily ascertainable: the names and relevant records of the class
2 members are in Defendants' possession.

3 Numerosity: Fed. R. Civ. P. 23(a)(1)

4 On information and belief, both Classes include at least several hundred members.
5 During the 2017 fiscal year (July 1, 2016 through July 30, 2017), there were 2687
6 admittances to the possession of marijuana diversion program. The marijuana diversion
7 program has maintained similar numbers of admittances in its last several years of
8 operation. Therefore, there were likely at least 2500 admittances in the 2018 fiscal year.
9 Thus, if even a small percentage of the people admitted to TASC since August 23, 2016
10 meet the requirements for the Classes, the Classes would number in the hundreds.
11 Moreover, on information and belief, a large majority of those arrested and prosecuted
12 for marijuana possession in Maricopa County are deemed indigent for the purposes of
13 appointment of counsel.

14 Commonality: Fed. R. Civ. P. 23(a)(2)

15 The Class members' claims raise common issues of fact and law. With respect to
16 the Damages Class, those common questions include, but are not limited to:

- 17 a. Whether Defendants have a policy, practice, and custom of refusing to consider
18 diversion participants for program completion after 90 days and beyond solely
19 because they cannot afford to pay the required fees, without inquiring into those
20 participants' ability to pay;
- 21 b. Whether Defendants have a policy, practice, and custom of requiring diversion
22 participants who have not paid the required fees to remain on diversion supervision
23 until they have done so, without inquiring into those participants' ability to pay;
- 24 c. Whether Defendants' diversion extension policies (in subparagraphs (a) and (b))
25 violate the Due Process and Equal Protection Clauses of the Fourteenth
26 Amendment to the U.S. Constitution;

- 1 d. Whether Defendants have a policy, practice, and custom of requiring diversion
- 2 participants who remain on diversion solely due to inability to pay to continue to
- 3 submit to and pay for random drug and alcohol tests; and
- 4 e. Whether Defendants' policy of continuing this mandatory drug and alcohol testing
- 5 for participants who remain on the diversion program solely due to inability to pay
- 6 violates the Fourth Amendment to the U.S. Constitution.

7 With respect to the Injunctive Class, those common questions include, but are not limited
8 to:

- 9 a. Whether Defendants have a policy, practice, and custom of refusing to consider
- 10 diversion participants for program completion after 90 days and beyond solely
- 11 because they cannot afford to pay the required fees, without inquiring into those
- 12 participants' ability to pay;
- 13 b. Whether Defendants have a policy, practice, and custom of requiring diversion
- 14 participants who have not paid the required fees to remain on diversion supervision
- 15 until they have done so, without inquiring into those participants' ability to pay;
- 16 c. Whether Defendants' diversion extension policies (in subparagraphs (a) and (b))
- 17 violate the Due Process and Equal Protection Clauses of the Fourteenth
- 18 Amendment to the U.S. Constitution;
- 19 d. Whether Defendants have a policy, practice, and custom of requiring diversion
- 20 participants who remain on diversion solely due to inability to pay to continue to
- 21 submit to and pay for random drug and alcohol tests;
- 22 e. Whether Defendants' policy of continuing this mandatory drug and alcohol testing
- 23 for participants who remain on the diversion program solely due to inability to pay
- 24 violates the Fourth Amendment to the U.S. Constitution;
- 25 f. Whether Defendants have a policy, practice, and custom of requiring diversion
- 26 participants to make a minimum monthly payment and terminating those who fail
- 27 to do so, without inquiring into those participants' ability to pay; and
- 28

1 g. Whether Defendants' policy of terminating participants who cannot afford to make
2 a minimum monthly payment violates the Due Process and Equal Protection
3 Clauses of the Fourteenth Amendment to the U.S. Constitution.

4 Typicality: Fed. R. Civ. P. 23(a)(3)

5 The Named Plaintiffs' claims are typical of the claims of the members of the Class,
6 and they have the same interests in this case as all other members of the Class that they
7 represent. The determination whether the Defendants' scheme of policies, practices, and
8 customs is unlawful in the ways alleged will determine the claims of the named Plaintiffs
9 and every other class member.

10 Adequacy: Fed. R. Civ. P. 23(a)(4)

11 Named Plaintiffs are capable of fairly and adequately protecting the interests of
12 the Class because Named Plaintiffs do not have any interests antagonistic to the Class.
13 There are no known conflicts of interest among class members, all of whom have a similar
14 interest in vindicating the constitutional rights to which they are entitled. Plaintiffs'
15 counsel are experienced in civil rights litigation and have successfully litigated a number
16 of civil rights class action cases. Many of those cases, like this one, involve
17 unconstitutional penalties based solely on wealth status.

18 Predomination, Injunctive Class: Fed. R. Civ. P. 23(b)(2)

19 Class treatment under Rule 23(b)(2) is appropriate because the common questions
20 of law and fact predominate in this case. For Named Plaintiffs McKenna Stephens and
21 Lucia Soria, as well as for the members of the Class, this case turns on what the
22 Defendants' policies and practices are and on whether those policies are lawful. The
23 common questions of law and fact listed above are dispositive questions in the case for
24 every member of the Class. Because the putative Class challenges the Defendants'
25 scheme as unconstitutional through injunctive relief that would apply to every member of
26 the Class, Rule 23(b)(2) certification is proper.

1 Predomination, Damages Class: Fed. R. Civ. P. 23(b)(3)

2 Class treatment under Rule 23(b)(3) is appropriate because the common questions
3 of law and fact overwhelmingly predominate in this case. For every Named Plaintiff, as
4 well as for the members of the Class, this case turns on what the Defendants' policies and
5 practices are and on whether those policies are lawful.

6 The common questions of law and fact listed above are dispositive questions in the
7 case of every member of the Class. Moreover, the question of liability can therefore be
8 determined on a class-wide basis. To the extent that individual damages will vary, they
9 will vary depending in large part on the amount of time that a person was subjected to the
10 unlawful scheme and the amount of money coerced from them.

11 Determining damages for individual class members can thus typically be handled
12 in a ministerial fashion based on easily verifiable records in the Defendants' possession.
13 If need be, individual hearings on class members' specific damages based on special
14 circumstances and particular hardships caused by Defendants' scheme can be held after
15 class-wide liability is determined.

16 **VII. Damages**

17 Plaintiffs and the putative class members they represent **sought** compensatory
18 damages from both **Defendants Maricopa County and Allister Adel, in his official**
19 **capacity [the "County Defendants"]** and TASC. **However, Plaintiffs have reached a**
20 **settlement in principle with the County Defendants that will resolve their claims**
21 **against them, with the exception of the portion of Plaintiffs' attorneys' fees**
22 **attributable to the County Defendants, which will be negotiated separately.**
23 **Therefore, Plaintiffs and putative class members now seek damages exclusively**
24 **against Defendant TASC.**

25 Plaintiffs and putative class members also seek punitive damages against
26 Defendant TASC only. **Plaintiffs previously planned to calculate class damages upon**
27 **receipt of critical, discoverable information from Defendant TASC, including, in**
28 **particular, MDPP participants' program files. However, Defendant TASC has**

1 refused to produce the documents that would allow Plaintiffs to do a precise
 2 calculation of damages. In light of the Court's recent order granting Plaintiffs'
 3 motion to compel MDPP participants' program files, Doc. 173, Plaintiffs expect to
 4 receive a representative sample of those files shortly.

5 However, given the delays in receiving this production, Plaintiffs have chosen
 6 to calculate an estimate of Defendant TASC's liability for damages based on the
 7 information currently available to them. Although Plaintiffs had hoped to be able to
 8 provide a precise damages calculation, Plaintiffs believe that the calculation below
 9 is an accurate estimate of Defendant TASC's liability. Wherever possible, Plaintiffs
 10 have made assumptions that would tend to underestimate TASC's total damages.
 11 Given this, and based on Plaintiffs' investigation, Plaintiffs believe that it is highly
 12 likely that Plaintiff's calculation of Defendant TASC's liability will increase when
 13 Plaintiffs receive the sample of program files. Plaintiffs will update this disclosure
 14 within thirty days of calculating a precise liability amount after receiving the
 15 sample of program files, in keeping with the requirements of the MDPP.⁴

16 In addition to damages, Plaintiffs and putative class members will seek attorneys'
 17 fees and costs attributable to their litigation against Defendant TASC pursuant to 42
 18 U.S.C. § 1988.

19 Plaintiffs reserve the right to supplement or amend this disclosure, including
 20 with additional categories of damages, upon receipt of additional information,
 21 including outstanding discoverable information Plaintiffs expect to receive from
 22 Defendant TASC.

23 A. Class Damages

24
 25
 26 ⁴ The Court has not yet decided on the size of the sample of program files that
 27 Plaintiffs will receive, and the parties dispute the appropriate size. However, based
 28 on the prevailing law, Plaintiffs expect to receive a sample that is both randomly
 selected and sufficiently large to allow Plaintiffs to make reliable extrapolations
 about TASC's total damages liability in this case.

1 Defendant TASC is exposed to significant damages and other monetary costs.
2 As described in detail below, Plaintiffs estimate that TASC faces at least \$10.49
3 million in monetary damages, plus Plaintiffs' attorneys' fees and expenses, and
4 punitive damages. Indeed, in a similar case litigated by attorneys at Civil Rights
5 Corps, *Rodriguez v. Providence Community Corrections, Inc.*, No. 3:15-cv-1048 (M.D.
6 Tenn.), Plaintiffs settled a lawsuit against Rutherford County and a private
7 probation company for \$14,300,000, as well as substantial injunctive relief. *See*
8 *Settlement and Agreement to Release, Rodriguez v. Providence Community*
9 *Corrections, Inc.*, No. 3:15-cv-1048 (M.D. Tenn. Oct. 18, 2017).⁵

11 Defendant TASC faces damages liability for three primary harms: (1) drug-
12 testing of diversion participants who were extended because of their inability to pay
13 fees during the pay-only period⁶ of supervision, in violation of the Fourth
14 Amendment; (2) extension of diversion participants solely due to their inability to
15 pay fees, in violation of the Fourteenth Amendment; and (3) termination of diversion
16 participants solely due to their inability to pay fees, in violation of the Fourteenth
17 Amendment.

18 Plaintiffs first set forth TASC's liability per violation, and then, based on
19 these figures, the estimated liability for damages per class member. Plaintiffs then
20 explain their estimate for TASC's total damages liability for all putative class
21 members, for Named Plaintiffs, and the total damages for which Plaintiffs estimate
22 that TASC is liable.

24 ⁵ As a courtesy, Plaintiffs will provide a copy of this document to Defendant TASC
25 with service of this supplement.

26 ⁶ Plaintiffs use the term "pay-only period" to refer to the period following a
27 participant's first 90 days of participation wherein TASC's sole basis for continuing
28 to subject the person to program requirements was failure to pay all program fees
in the first 90 days.

1 **1. Liability for damages per harm imposed**

2 Based on the harms at issue and settlements in similar cases, Plaintiffs
3 estimate that those harms should be valued as follows:

4 ***a. Wealth-based extended drug testing.*** For class members who were subject
5 to drug tests during the pay-only period:

6 **i. 120% restitution for each unlawful drug test**

7 **ii. Damages in the amount of \$120 per unlawful test**

8 These damages numbers are in line with a recent settlement in a highly
9 analogous case, *Luse v. Sentinel Offender Services, LLC*, No. 2:16-cv-00030-
10 WCO (N.D. Ga.).⁷ There, Plaintiffs sued to enjoin a private probation
11 company from requiring people on probation for minor traffic offenses to
12 submit to and pay for drug tests that were not ordered by the court. *See Order*
13 *Granting Final Approval of Class Settlement, Luse v. Sentinel Offender*
14 *Services, LLC*, at 1-3 (Aug. 21, 2017). In Plaintiffs' settlement with the County
15 and the private probation company, each of the 276 class members received
16 (1) restitution of any fees paid for drug screening, plus 7 percent per annum
17 interest; and (2) damages of up to \$90 per unauthorized drug test. *Id.* at 4-5.⁸

18 For the sake of administrability, Plaintiffs do not include interest on
19 restitution as the *Luse* plaintiffs did. However, restitution at 120% is in line
20 with the interest payments in *Luse*. For example, if Plaintiffs applied the
21 percent interest per annum from *Luse*, assuming 18 unauthorized tests at \$15
22

23
24 ⁷ As a courtesy, Plaintiffs will provide a copy of this document to Defendant TASC
25 with service of this supplement.

26 ⁸ The harm in *Luse* only involved one portion of the harms involved in this case:
27 unlawful drug testing. Based on these damages, the settlement fund in *Luse*—for 276
28 class members who submitted to an average of 3.5 unlawful tests—was \$80,000. *Luse*
Settlement at 4.

1 per test,⁹ a class member who was subject to these tests at the start of the
 2 relevant period (which began approximately four years ago) would receive
 3 \$270 restitution plus \$75.60 in interest (\$345.60 total). A class members
 4 subject to unauthorized tests three years ago would receive \$56.7 (\$326.70
 5 total). Using Plaintiffs' calculation of \$120 restitution, the same individual
 6 would receive \$324 total.

7 As for the damages payment for test, Plaintiffs are likely entitled to a
 8 higher damages payment because the tests demanded by Defendant TASC
 9 were more invasive than those in *Luse*.¹⁰

10 As described below, based on the information currently available,
 11 Plaintiffs estimate that there are at least 2009 class members who were
 12 unlawfully drug-tested.

13 *b. Wealth-based extension.* For class members who were required to remain
 14 on TASC supervision solely because of their inability to afford fees:

15 i. Damages in the amount of \$200 for each month (prorated) that
 16 a pre-file¹¹ diversion participant was on pay-only diversion
 17 supervision
 18
 19

20 ⁹ Plaintiffs' basis for these assumptions is described below.

21
 22 ¹⁰ Defendant TASC's employees "watch[ed] participants through glass panels while
 23 they submit[ted] urine for drug and alcohol testing," and "[i]n at least one TASC
 24 location, the bathroom where participants submit urine for testing includes multiple
 25 mirrors so that a TASC employee can watch the participant urinate from multiple
 26 angles." Sec. Am. Comp. (Doc. 110) ¶¶ 108-109. The degree of intrusion is relevant
 27 to the Fourth Amendment violation at issue, including the intrusiveness of the
 28 particular method of drug testing. *See Vernonia School Dist. 47J v. Acton*, 515 U.S.
 646, 658 (1995) ("[T]he degree of intrusion depends on the manner in which
 production of the urine sample is monitored.").

¹¹ "Pre-file" class members include diversion participants who enrolled in MDPP
 before criminal charges were actually filed against them, whereas "post-file" class

1 ii. Damages in the amount of \$400 for each month (prorated) that
 2 a post-file diversion participant was on pay-only diversion
 3 supervision¹²

4 These numbers are less substantial than those in *Rodriguez v.*
 5 *Providence Community Corrections, Inc.*, No. 3:15-cv-1048 (M.D. Tenn.),
 6 where, as here, Plaintiffs challenged extensions of supervision terms based on
 7 their inability to pay fees. Plaintiffs, represented by Civil Rights Corps,
 8 reached a class settlement with the defendant county government and private
 9 probation company that entitled each class member to receive (1) a cash
 10 award of 125% of fees paid to the private probation company (which ranged
 11 from several hundred to several thousand dollars); and (2) \$50 for each
 12 month of “supervised probation.” *See Rodriguez Settlement* at 18. In total, the
 13 settlement fund was set at \$14,300,000. Of that amount, the county
 14 government was responsible for paying less than 2% of those damages
 15 (\$300,000), and the private company was responsible for the rest. *See Mot.*
 16 *for Prelim. Approval for Settlement* (Doc. 191) at 4, *Rodriguez v. Providence*
 17 *Community Corrections, Inc.*, No. 3:15-cv-1048 (M.D. Tenn. Sept. 18, 2017).¹³

18
 19
 20 members include diversion participants who enrolled in MDPP after charges had
 21 been filed.

22 ¹² The damages amount has higher value for post-file class members because
 23 criminal charges had actually been filed against them in court; increased time with
 24 a pending drug charge could affect their employment and access to myriad other
 25 resources and opportunities.

26 ¹³ Ultimately, the private company paid the county’s share of the settlement as well
 27 pursuant to its settlement of a cross-claim with the county. *See Mot. for Prelim.*
 28 *Approval for Settlement* (Doc. 191) at 4, *Rodriguez v. Providence Community*
 Corrections, Inc., No. 3:15-cv-1048 (M.D. Tenn. Sept. 18, 2017) (stating that the
 private company would pay the county \$350,000, and that the county would then
 deposit \$300,000 of that amount into the Settlement Fund.)

1 As another point of reference, state statutes that compensate
 2 individuals for wrongful convictions set compensation for probation, parole,
 3 and post-release supervision at between \$25,000 and \$50,000 per year, which
 4 amounts to a monthly sum of roughly \$2100 to \$4200.¹⁴ Although the wealth-
 5 based extensions in this case do not involve wrongful conviction, they do
 6 involve enhanced penalties that were wrongfully imposed, and for post-file
 7 participants, they include increased time with a pending criminal drug charge
 8 on one's record. These statutes are a useful guide to the monetary value that
 9 state legislatures have assigned to time unjustly spent on criminal supervision.
 10 Plaintiffs' assigned values for post-file participants are less than a fifth of the
 11 lowest of these monthly rates.
 12

13 As described below, based on the information currently available,
 14 Plaintiffs estimate that there are approximately 482 class members who were
 15 unlawfully extended and 1527 post-file class members who were unlawfully
 16 extended.

17 *c. Wealth-based termination.* For individuals who were terminated from
 18 diversion solely due to their inability to pay fees:

- 19 i. 100% restitution of all fees paid to TASC before termination;
- 20 ii. For individuals who were terminated and not convicted,
- 21 damages in the amount of \$1500;
- 22 iii. For individuals who were terminated and convicted, damages
- 23 in the amount of \$5500.
- 24

25
 26 ¹⁴ See, e.g., C.R.S.A. § 13-65-101, *et seq.* (Colorado, providing for \$25,000 per
 27 year); DC ST § 2-421, *et seq.* (Washington, D.C., providing for \$40,000 per year);
 28 H.B. 2579 (Kansas, providing for \$25,000 per year); M.S.A. § 590.11 & § 611.362,
et seq. (Minnesota, providing a minimum of \$25,000 and maximum of \$50,000 per
 year); RCWA §4.100.010, *et seq.* (Washington, providing \$25,000 per year).

1 These values are conservative in light of the harms at issue. Because
2 these class members paid for diversion in order to avoid prosecution—but
3 were then terminated because of their poverty—restitution plus penalties is
4 appropriate. As for class members who were not convicted subsequent to
5 their terminations, Plaintiffs estimate based on available evidence that the
6 vast majority of this group will include pre-file participants who were
7 terminated, had charges filed against them, and were then re-enrolled in
8 MDPP as post-file participants. Thus, the termination resulted in the filing of
9 criminal drug charges against them, which has significant collateral
10 consequences. Even where this was not the case, these participants were
11 referred for prosecution in circumstances where, but for their poverty, they
12 would instead have had their charges dismissed.

13
14 For post-file participants who were terminated and convicted, this
15 amount exceedingly low, particularly for those who were convicted of felony
16 offenses.¹⁵ Felony convictions in Arizona carry severe consequences,
17 including but not limited to termination of voting rights, prohibitions on
18 public housing and other public benefits, restrictions on employment and
19 licensing, and reputational harm. Since Arizona does not allow expungement
20 of criminal convictions, the class members who were convicted of drug
21 offenses (in circumstances where they would not have been prosecuted if they
22
23
24

25
26 ¹⁵ In Arizona, possession of any amount of marijuana—even trace amounts—can be
27 prosecuted as a felony. *See* Ariz. Rev. Stat. § 13-3405(B)(1) (providing that
28 possession of “an amount of marijuana not possessed for sale having a weight of less
than two pounds is guilty of a class 6 felony”).

1 were wealthy) must now live with those convictions on their records and
 2 suffer the consequences of them indefinitely, if not permanently.¹⁶

3 As described below, based on the information currently available,
 4 Plaintiffs estimate that there are approximately 121 class members who were
 5 unlawfully terminated and not convicted and 382 class members who were
 6 unlawfully terminated and convicted.

7 **2. Liability exposure for damages per class member**

8 Based on Plaintiffs' review of program files so far, individuals who were
 9 extended because of their poverty spent an average of approximately 4 additional
 10 months on pay-only supervision, during which time they submitted to
 11 approximately 18 additional drug tests.¹⁷ For the purposes of this calculation,
 12 Plaintiffs assume that each test cost \$15.¹⁸

14 ¹⁶ Although Arizona does not offer expungement, it does allow individuals to apply
 15 to "set aside" a conviction, but this does not actually remove the conviction from
 16 one's record. *See* Ariz. Rev. Stat. § 13-907. Thus, for example, an employer would
 17 still see the conviction, but would also see the set aside order.

18 ¹⁷ This comports with Plaintiffs' experiences, which are typical of the putative class.
 19 For example, Plaintiff Deshawn Briggs submitted to 15 drug tests during his three-
 20 month pay-only period, *see* TASC000064; Mark Pascale submitted to 23 tests during
 21 his nearly four-and-a-half month pay only-period, *see* TASC000274. Plaintiffs are
 also aware of cases in which participants were subject to longer of extended
 supervision and as many as four tests per week.

22 ¹⁸ This estimate is very conservative. TASC charged a baseline rate of \$15 for drug
 23 and alcohol tests, but TASC imposed a surcharge for certain common payment
 24 methods, and the available evidence suggests that (for unknown reasons) some
 25 participants were likely charged more per test. Once Plaintiffs receive a
 26 representative sample of the program files, Plaintiffs plan to use them to extrapolate
 27 the proportion of drug and alcohol tests that cost each different amount and re-
 28 calculate the estimate liability for restitution of class members' payments for these
 tests during the pay-only period accordingly. Based on the information currently
 available, Plaintiffs strongly anticipate that the restitution amount per class member
 will rise, which could significantly increase the amount of class damages overall.

1 Based on these approximations, Plaintiffs estimate damages per class member
2 as follows:

- 3 • Pre-file class member unlawfully extended: \$3,284
- 4 • Post-file class member unlawfully extended: \$4,084
- 5 • Class members who were unlawfully terminated, but not convicted:
6 \$1,750¹⁹
- 7 • Class members who were unlawfully terminated and convicted: \$5,750

8
9 **3. Liability exposure for class damages**

10 Plaintiffs estimate Defendant TASC's liability for class damages based on the
11 information that Plaintiffs have reviewed in discovery so far.²⁰ Based on Defendant
12 TASC's representations, Plaintiffs estimate that approximately 7000 individuals
13 participated in MDPP during the relevant period. *See* TASC Rep. (Doc. 178) at 5.

14
15 ¹⁹ For the purposes of this calculation, Plaintiffs conservatively estimate that
16 terminated participants have paid an average of \$250 to TASC, including drug and
17 alcohol testing fees. However, based on the information currently available to
18 Plaintiffs, this is likely an under-estimate. Plaintiffs assume that no pre-file
19 participant who was terminated was subsequently convicted (which is unlikely,
20 based on the information available to Plaintiffs), and that all post-file participants
21 who were terminated were convicted (which is appropriate since all participants are
22 required to submit statements confessing to the underlying facts of the alleged
23 offense in order to enroll in MDPP, and these statements are admissible against them
24 in criminal proceedings). Once plaintiffs receive a representative sample of TASC's
25 program files, Plaintiffs will make a more precise calculation.

26 ²⁰ Plaintiffs expect that, once they receive a sample of the program files, Plaintiffs
27 will be able to make these estimates with greater accuracy. Therefore, for the present
28 purposes, Plaintiffs have made conservative estimates. However, Plaintiffs will
revise these estimates for future offers once Plaintiffs have received and reviewed
the program files and can extrapolate the necessary information from them. As
noted with respect to several of Plaintiffs' current estimates, because Plaintiffs have
chosen to make conservative estimates for the time being, Plaintiffs expect the total
class liability exposure calculated for Defendant TASC to rise, potentially
significantly.

1 Of those participants, Plaintiffs estimate—conservatively—that at least 35 percent
 2 were too poor to afford TASC’s fees.²¹ Plaintiffs then reduced that number by 18%,
 3 which is the portion of positive drug tests collected by TASC-run diversion
 4 programs, to account for individuals who would not have successfully completed
 5 diversion even if they were able to pay. *See* MC-00531.²² Thus, Plaintiffs expect that
 6 there are at least 2009 class members eligible for damages.

7 Plaintiffs also estimate, based on the available evidence, that approximately
 8 76% of MDPP participants are post-file, and 24% are pre-file. *See* MC-00546. As a
 9

10
 11 ²¹ This estimate is almost certainly low. Although Defendant TASC has stated that
 12 it has not tracked the number of indigent participants in this program and Plaintiffs
 13 have not yet been able to review an appropriate sample of program files to make an
 14 estimate, certain documents provided by Maricopa County in discovery are useful
 15 in estimating the potential number of class members. For example, in the first
 16 quarter of 2019, TASC reported that 31.41 percent of participants paid a “sliding
 17 scale” fee amount rather than the full fee amount. *See* MC-00571. These documents
 18 suggest that, at approximately this time period, participants became eligible for the
 19 sliding scale at 175-199% of the federal poverty level, which, for a single adult,
 20 means an annual income of \$21,858-24,980. *See* MC-00242-243. A living wage in
 21 Maricopa County for a single adult is \$25,563. *See* Mass. Inst. Tech., Living Wage
 Calculator, <https://livingwage.mit.edu/counties/04013> (last visited Aug. 25, 2020).
 Therefore, the sliding scale is under-inclusive of individuals who cannot afford basic
 expenses, much less pay \$950 or \$1000 within three months. In addition, TASC
 reported that, of MDPP participants between March 1, 1989 to March 31, 2018,
 29.4% of participants were unemployed, 1.7% were disabled, and 25.2% worked
 only part time. *See* MC-00547.

22 ²² This is almost certainly an overestimate. The 18% figure comes from data about
 23 *all* TASC-run diversion programs and not just the MDPP, so it includes individuals
 24 who were referred for using more addictive narcotics. Moreover, TASC does not
 25 penalize all individuals who test positive one time; thus, the rate of positive tests does
 26 not neatly equate to the rate of valid terminations or extensions. However, Plaintiffs
 27 have used this over-inclusive number to account for other reasons unrelated to
 28 payment for which participants who cannot afford to pay fees might be terminated
 or extended. When Plaintiffs receive a representative sample of program files,
 Plaintiffs intend to re-calculate this figure based on that more precise information.
 Plaintiffs anticipate that doing so will increase their estimate of the number of class
 members eligible for recovery and thus, TASC’s liability for damages overall.

1 result, Plaintiff expect approximately 482 pre-file class members and 1527 post-file
2 class members who were extended or terminated.

3 With respect to termination, TASC reports that approximately 25% of MDPP
4 participants have been terminated. MC-00576. Using this figure, Plaintiffs estimate
5 that approximately 121 pre-file class members and 382 post-file class members were
6 unlawfully terminated.²³

7 Accordingly, Plaintiffs estimate total liability for class damages at
8 \$10,224,806.

9
10 **4. Compensation for Named Plaintiffs**

11 Based on the valuations above, Plaintiffs can now calculate Named Plaintiffs'
12 particular damages.

13 Plaintiffs previously anticipated seeking restitution of all MDPP-associated fees
14 submitted for all class members. However, as described above, Plaintiffs now plan
15 to do so only for class members who were terminated. This appears more
16 appropriate to the harms at issue because Plaintiffs do not challenge Defendants'
17 right to impose fees, but rather their imposition of penalties and exclusion of
18 participants from opportunities based on their inability to pay those fees. With
19 respect to unlawful termination, it remains appropriate for terminated class
20 members to receive full reimbursement of fees paid because those fees were paid in
21

22
23 ²³ Plaintiffs' calculation assumes that class members who were terminated were
24 extended as well, since this is consistent with the evidence currently available to
25 Plaintiffs. While this was likely not true in every case, Plaintiffs compensate for any
26 overestimate that might result by excluding the possibility of multiple violations
27 against the same individual (which is also consistent with the available evidence).
28 For example, a pre-file participant may be extended, then terminated, then re-
enrolled in MDPP as a post-file participant, then extended again, then terminated
and convicted. Therefore, the estimate is likely to be conservative overall. Plaintiffs
plan to adjust this number upon review of a representative sample of program files.

order to receive a benefit—avoidance of prosecution—which, due to their poverty, they did not receive.

In addition, Plaintiffs previously included lost wages and transportation costs in earlier damages calculations, but Plaintiffs now plan to refrain from doing so in order to increase the administrability of calculating damages for each class member. Accordingly, Plaintiffs calculate each Named Plaintiffs' damages based on the specific violations that each suffered as follows:

a. Deshawn Briggs

Violation	Extent of violation	Value
Months extended on post-file diversion (\$400/month, prorated)	3 months.	\$1200
Total paid for drug tests during pay-only period (120% restitution)	\$174	\$209
Total number of drug tests	14 ²⁴	\$1680
Damages		\$3,089

b. Antonio Pascale, as representative of Mark Pascale

Violation	Extent of violation	Value
-----------	---------------------	-------

²⁴ Plaintiffs previously understood Plaintiff Briggs' records to show that he was required to submit to 15 drug and alcohol tests during the pay-only period. Based on this, and assuming Defendant TASC's \$15 testing rate, which appears to have been standard during the relevant period, Plaintiffs previously estimated that Mr. Briggs had paid approximately \$195 for those tests. However, it appears that Mr. Briggs' case manager made at least one error in Mr. Briggs' billing and/or testing records. *See* TASC000064, TASC000068, TASC000086. Based on closer analysis, it appears that Mr. Briggs was required to submit to 14 drug and alcohol tests, for which he paid \$174. Further discovery on this error may help to clarify this issue, and Plaintiffs may seek information from Defendant TASC and/or Henry Rojo, Mr. Briggs' case manager, for this purpose.

Months extended on post-file diversion (\$400/month, prorated)	4.47 months	\$1788
Total paid for drug tests during pay-only period (120% restitution)	\$360	\$432
Total number of drug tests (\$120 damages per test)	25	\$3000
Damages		\$5220

c. Lucia Soria

Violation	Extent of violation	Value
Months extended on prw-file diversion (\$200/month, prorated)	1.87 months²⁵	\$374
Total paid for drug tests during pay-only period (120% restitution)	\$120	\$144
Total number of drug tests (\$120 damages per test)	8	\$3000
Damages		\$1478

As is typical in class actions, in addition to these damages, Defendant TASC will also be liable for compensation to Named Plaintiffs for their roles. For example, in *Luse v. Sentinel Offender Services, LLC*, No. 2:16-cv-00030-WCO (N.D. Ga), Named Plaintiffs were awarded approximately 23 times the amount awarded to the average

²⁵ Plaintiffs moved for leave to file a Second Amended Complaint, adding Plaintiff Soria as a Named Plaintiff to represent the putative Injunctive Class, on August 28, 2019. *See* Doc. 99. At that point, Ms. Soria was on pay-only diversion supervision and had been extended for over one month and a half. On September 4, 2020, Defendant TASC informed Ms. Soria that she had successfully completed the program and released her.

1 class member, plus their individual damages.²⁶ A court in this district has approved
 2 an incentive payments of 72 times the settlement amount for the average class
 3 member. *Ritchie v. Van Ru Credit Corp.*, No. 2:12-CV-01714-PHX-SM, 2014 WL
 4 3955268, at *3 (D. Ariz. Aug. 13, 2014) (approving an incentive payment of \$12,000
 5 where class members would receive, on average, \$167).

6 As described above, class members stand to be awarded, on average between
 7 approximately \$3200 to \$5700 each. Accordingly, Plaintiffs estimate at present that
 8 an incentive payment of \$85,000 to Named Plaintiffs would be appropriate, as this
 9 sum is slightly less than twenty times the value at the middle of the class members'
 10 recovery range.

11 Including both Named Plaintiffs' Incentive Payments and individual damages,
 12 Defendant TASC would be liable for \$264,787.

13 5. Total Damages Liability Exposure

14 Based on the calculations above, Defendant TASC's total damages exposure
 15 is estimated at \$10,489,593.

16 B. Liability for Plaintiffs' Reasonable Attorneys' Fees and Expenses Pursuant 17 to 42 U.S.C. § 1988

18 In civil rights cases like this one, counsel for prevailing plaintiffs request an
 19 award for reasonable attorneys' fees and non-taxable expenses. 42 U.S.C. § 1988.
 20 "[A] court's discretion to deny fees under § 1988 is very narrow and ... fee awards
 21 should be the rule rather than the exception." *Arizona Dream Act Coal. v. Brewer*,
 22
 23
 24

25
 26 ²⁶ The average class member in *Luse* was compensated \$15 in restitution and \$90 in
 27 damages for an average of 3.5 unlawful drug tests. See Attachment B at 4-5. Thus,
 28 the average class member's award amount was \$315. The Named Plaintiffs were
 awarded \$7500 for their roles in the case, and one also was awarded \$10,000 in
 damages. *Id.* at 9.

1 No. CV 12-02546-PHX-DGC, 2018 WL 6448395, at *1 (D. Ariz. Dec. 10, 2018)
2 (quotations omitted).

3 Pursuant to Plaintiffs' settlement with Maricopa County and Defendant
4 Allister Adel, in his official capacity ["the County Defendants"], the County
5 Defendants will pay attorneys' fees attributable to Plaintiffs' efforts on matters that
6 exclusively involve them, and they will pay no more than 50% of attorneys' fees
7 attributable to litigation involving both MCAO and TASC.

8 However, the parties' agreement provides that MCAO is not liable for any
9 fees starting on the date that settlement negotiations began: May 8, 2020. TASC
10 faces sole responsibility for reasonable fees and costs incurred after that date.

11 Plaintiffs' counsel are currently in the process of calculating their fees and
12 expenses for the purposes of settlement with the County Defendants, and Plaintiffs
13 will update this disclosure within 30-days once that initial calculation has been
14 prepared.

15 Ultimately, however, Plaintiff's counsel do not know the precise amount of
16 fees that will accrue over the course of the litigation if this case does not settle.
17 However, it would likely be a significant sum. For example, a federal district court
18 recently concluded that, after approximately four years of litigation, a claim for
19 \$4,428,466.25 in fees and \$300,721.99 in costs under § 1988 for attorneys on a team
20 led by Civil Rights Corps, where several of Plaintiff's counsel are employed, was
21 reasonable. *ODonnell v. Harris Cty., Texas*, No. CV H-16-1414, 2019 WL 4224040, at
22 *23 (S.D. Tex. Sept. 5, 2019). In *Arizona Dream Act Coal. v. Brewer*, a court in this
23 district awarded \$1,890,567.30 in attorneys' fees and \$81,609.53 in non-taxable
24 costs. No. CV 12-02546-PHX-DGC, 2018 WL 6448395, at *12.
25
26
27
28

1 **Liability for Punitive Damages**

2 At the motion to dismiss stage, the district court rejected Defendant TASC's
3 argument that Plaintiffs may not seek punitive damages against it. *See* Doc. 89 at 16.
4 Therefore, Defendant TASC also faces liability exposure for punitive damages.

5 **VIII. Relevant Insurance Agreements**

6 At this time, Plaintiffs are unaware of any insurance policies maintained by
7 Defendants that may provide coverage for some or all of the claims asserted in this matter.
8 Plaintiffs are also presently unaware of whether Defendant TASC has an insurance
9 policy that covers all or part of its legal representation in this case.

10 ***

11 The undersigned hereby certifies that the responses provided herein are complete
12 and correct as of the time made, based on the undersigned's knowledge, information, and
13 belief formed after a reasonable inquiry, and signed under Rule 26(g) of the Federal Rules
14 of Civil Procedure.

15 DATED this 28th day of August, 2020.

16
17 By /s/Katherine Chamblee-Ryan
18 Katherine Chamblee-Ryan
19 Olevia Boykin
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8 **CERTIFICATE OF SERVICE**

9 I hereby certify that on August 28, 2020, the attached document was served via
10 electronic mail upon counsel for all Defendants.

11 /s/Katherine Chamblee-Ryan
12 Katherine Chamblee-Ryan
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